

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic CE Rules hearing meeting of January 19, 2021  
**Date:** Wednesday, January 13, 2021 7:03:36 AM  
**Attachments:** [Aamodt CERules Opinion 01122020 Letter.docx](#)

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**From:** Aamodt, Garth <gaamodt@aamodtchiro.com>  
**Sent:** Tuesday, January 12, 2021 4:49 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic CE Rules hearing meeting of January 19, 2021

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I am submitting comments for the public hearing meeting regarding the proposed changes to the Chiropractic - General Rules rule set. I have a prior meeting commitment which may prevent my attendance via the Zoom meeting time, but I would request that my brief comments in my attached letter be read into the public record, if the rules allow. If you need any confirmation of my licensure to allow their submission, please let me know and I will comply with any procedures you require.

Sincerely,

Dr. Garth Aamodt, DC

SEE MY ATTACHED LETTER

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Disclaimer: This electronic message may contain information that is Confidential or legally privileged. It is intended only for the use of the individual(s) and entity named in the message. If you are not an intended recipient of this message, please notify the sender immediately and delete the material from your computer. Do not deliver, distribute or copy this message and do not disclose its contents or take any action in reliance on the information it contains.

\*\*\*\*\*

Aamodt Chiropractic Clinic, P.C.

Dr. Garth Aamodt D.C.

1805 44th Street S.E.

Grand Rapids, MI 49508

(616)455-4200

Professional Peer Review - Forensics - Disability, Impairment & Independent Medical Exams  
Fax: (616)455-4201 - Email: gaamodt@aamodtchiro.com - Website: www.aamodtchiro.com

Department of Licensing & Regulatory Affairs  
Bureau of Professional Licensing  
Board of Chiropractic  
Public Hearing on Proposed CE Approval Rule Changes  
Public Meeting: January 19, 2021

January 12, 2021

Dear Board, Associates and Colleagues.

I have a potential prior obligation on January 19, 2021 but will try to attend via Zoom. I request that if I cannot attend the public meeting personally that this letter be read into the public record. I have practiced in Grand Rapids my entire career since graduating from Palmer in 1982. I have seen several state associations come and go and have been a member of several at various times in the past. I am not a member of the M.A.C. which partly is a business decision since as an Independent Medical Examiner I do not want any perceived conflict of interest or inferred bias in cases I may be called upon to review. I respect the work and dedication of the M.A.C. leadership and offer my opinion merely as an independent chiropractor in Michigan.

I have observed both good and bad in the Continuing Education seminars available in our state over almost 40 years of practice here. I also appreciate the freedom to have a variety of choices and sponsoring groups for seminars, conventions, and accredited hours. I applaud the tightening and improvement in requirements as time has passed.

My concern in the new rule changes however are simply explained:

1. **There is a clear conflict of interest potential** when ANY trade association, in this case the M.A.C., is put in charge of approving CE hours when they themselves are a vendor and supplier of those same CE hours. This is so obvious it hardly needs explanation. Giving up and down approval power to a private group who themselves generate income by providing the CE classes is a terrible idea, even with the best of intentions to relieve pressure from the Board members currently tasked with determining such requests. For example, one does not assure transparency and integrity by putting one political party in-charge of approving all political commercials from competing political parties. There is money involved and the last thing we should do is put a potential partisan choke-point in the pipeline for assuring the public protection.

EXAMPLE 1: If the M.A.C. had ultimate approval power, and the leadership at some future time held a strong personal bias relative to vaccination, could that influence their decisions if a CE request dealing with immunization ideology—either way—came up for approval?

EXAMPLE 2: If the M.A.C. were sponsoring their own seminar on “radiology” from which they will recoup a profit, would that influence their decision to approve or deny a similar seminar application from another competing CE provider, even if potentially superior in format to their own? The appearance of bias would be unavoidable.

2. **There is no need to reinvent the wheel** that already exists and is used by most other states, as far as I understand. I have held licensure in Wisconsin and Minnesota. It is my understanding that most states use “P.A.C.E.” – “Providers of Approved Continuing Education” to winnow out the valid seminars from the self-promotional, “vendor” types of seminars with little or no academic foundation. Since they are a wing under the educational agency of Federation of Chiropractic Licensing Boards which oversees all chiropractic university education, licensing, and Board certification, they remain the highest level of neutral arbiter in issues of public safety, best-practice education, and standards of training.

More could be discussed, but I will confine my comments to just these two critical. I understand why the Board, with their own busy practices would like to divest themselves of what they may see as a burdensome and time-consuming activity. Passing such a responsibility off to a commercial trade organization with unavoidable conflicts of interests, is unwise in my opinion. I also do not doubt that the M.A.C. would have excellent people trying to be impartial and fair, but human nature is not amenable to best of intentions. I strongly urge that these proposed changes be rejected. I also urge that using the approved vetting already established by P.A.C.E. is a much more elegant and impartial solution, which requires no burden that I am aware of on our esteemed board members.

Sincerely,

  
Dr. Garth Aamodt, D.C.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Continuing Education  
**Date:** Monday, January 18, 2021 2:32:00 PM

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**From:** Jim Agrusa <jimagrusa@hotmail.com>  
**Sent:** Saturday, January 16, 2021 9:00 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic Continuing Education

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To Whom It May Concern

It was brought to my attention that there is a bill pending that would give The Michigan Association of Chiropractors the authority to determine continuing education seminars for Michigan chiropractors. While The MAC is a fine organization run by reputable people, I feel that this would be a mistake. Since The MAC is also in the business of holding continuing education seminars this has all the ear markings of a conflict of interest and would hinder the chiropractic profession in Michigan. It could potentially stifle the presentation of innovative ideas and the diversity of opinions. I would like to see this bill defeated and allow P.A.C.E. to continue to work with the Chiropractic Licensing Board to approve continuing education classes in our state.

Thank you,  
J. James Agrusa, D.C.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Opposing proposed rule of giving the MAC sole authority over CE  
**Date:** Monday, January 18, 2021 2:39:04 PM

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**From:** Anna Albers <annaalbers@gmail.com>  
**Sent:** Sunday, January 17, 2021 11:10 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Opposing proposed rule of giving the MAC sole authority over CE

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To the Policy Analyst of the State of Michigan and the Board of Chiropractic,  
It has come to my attention that the Board is considering a ruling giving the Michigan Association of Chiropractors (MAC) sole authority over Continuing Education for the chiropractic profession.

This essentially will result in a monopoly and restraint of trade by a trade association, MAC, which will be detrimental to the profession, its patients and the public. Other groups such as the Macomb County Chiropractors Association, OMNI, and Fetterman Events who have been providing quality, unbiased, continuing education programs, will be prevented from providing the required service for the chiropractors in Michigan.

I am a retired former medical professional in Michigan, and the possibility that the MAC will be the sole provider of CE programs in the state concerns me. This cannot be allowed to happen. There must be independent oversight. All CE provider organizations should be reviewed by the Board, or other unbiased groups such as P.A.C.E.. Please continue to allow Michigan Chiropractors access to diverse, quality CE programs for the benefit of the people of Michigan.

Sincerely,  
Anna Albers  
Retired Pharmacist and Michigan Resident.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Continuing Education Policy  
**Date:** Wednesday, January 13, 2021 1:34:19 PM

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**From:** Ted Arkfeld <drarkfeld@arkfeldchiropractic.com>  
**Sent:** Wednesday, January 13, 2021 12:45 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Continuing Education Policy

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Email to: [BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be

approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The State Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Ted A. Arkfeld, DC, MS

**Ted A. Arkfeld, DC, MS**  
**860 N. Center Avenue**  
**Suite A**  
**Gaylord, MI 49735**  
**(Office) 989-448-8065**  
**(Fax) 989-448-2818**

[www.arkfeldchiropractic.com](http://www.arkfeldchiropractic.com)



**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Public Hearing of January 19th 2021  
**Date:** Thursday, January 14, 2021 1:35:59 PM

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**From:** Brian Arnold DC ARNOLD <achiropt@comcast.net>  
**Sent:** Thursday, January 14, 2021 12:36 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic Public Hearing of January 19th 2021

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I am licensed in Florida, Colorado and Michigan for the past 38 years and this proposal should not be acceptable to any reasonable chiropractic board. We need fair and impartial options.

**The state Board's role is to protect the public, not to protect the M.A.C. Fairness should**

**prevail.** Thank you very much.  
Sincerely,

Name: \_\_\_\_\_ Dr Brian Arnold \_\_\_\_\_ Email Address:  
\_\_\_\_\_

## *Arnold Chiropractic Clinic*

**Brian A. Arnold D.C**  
31930 Harper Ave.  
St. Clair Shores Mi 48082

Ph#: 586-296-0991

Fax#: 586-296-7611

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[www.arnoldchiro.com](http://www.arnoldchiro.com)

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**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW:  
**Date:** Wednesday, January 13, 2021 10:44:20 AM

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**From:** Donaldatkinsdc <ddrdondc@aol.com>  
**Sent:** Wednesday, January 13, 2021 10:43 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:**

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Sincerely,

Name: Donald E. Atkins D.C.

Email Address:

[ddrdondc@aol.com](mailto:ddrdondc@aol.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: M.A.C. anti-trust  
**Date:** Friday, January 8, 2021 7:03:32 AM

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**From:** david batton <davidbatton@hotmail.com>  
**Sent:** Thursday, January 7, 2021 5:33 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** M.A.C. anti-trust

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Sincerely,

David R Batton, D.C.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Continuing Education  
**Date:** Monday, January 18, 2021 2:31:31 PM

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**From:** Janet Bednarz <drjbednarz@gmail.com>  
**Sent:** Friday, January 15, 2021 10:29 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Continuing Education

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Sincerely,

Janet M Bednarz D.C.     [drjbednarz@gmail.com](mailto:drjbednarz@gmail.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: CE aproval  
**Date:** Tuesday, January 19, 2021 11:31:01 AM

---

**From:** linda berry <spiritwoman44@gmail.com>  
**Sent:** Tuesday, January 19, 2021 11:30 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** CE aproval

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I am writing to request that approval of continuing education credits be approved by an independent organization such as the board or chiropractic or PACE. This will insure that there is no conflict of interest with MAC sponsored educational programs.

--

Linda Berry, DC  
Complete Chiropractic and Bodywork Therapies  
2020 Hogback Rd. #7  
Ann Arbor, MI 48105

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Major Chirop  
**Date:** Thursday, January 7, 2021 3:24:46 PM  
**Attachments:** [Blank 5.pdf](#)

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**From:** ReidSKay <reidskay@aol.com>  
**Sent:** Thursday, January 7, 2021 3:12 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Major Chirop

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Sent from my iPad

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Beverly Blas  
6974 Pebble Park Circle  
West Bloomfield, Mi. 48324

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education  
**Date:** Tuesday, January 5, 2021 4:34:44 PM

---

**From:** dbogart892@aol.com <dbogart892@aol.com>  
**Sent:** Tuesday, January 5, 2021 4:32 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education

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[dbogart892@aol.com](mailto:dbogart892@aol.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Questions- Pending rule set #: 2019-84 LR - Department of Licensing & Regulatory Affairs, Bureau of Professional Licensing  
**Date:** Monday, January 11, 2021 4:33:07 PM  
**Attachments:** [2021.01.11 Letter to LARA.docx](#)

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**From:** Rep. Kyra Harris Bolden (District 35) <KyraBolden@house.mi.gov>  
**Sent:** Monday, January 11, 2021 4:25 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Questions- Pending rule set #: 2019-84 LR - Department of Licensing & Regulatory Affairs, Bureau of Professional Licensing

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Good Afternoon-

Please see the attached document with questions from our office regarding pending rule set #: 2019-84 LR.

In service,

Representative Kyra Bolden  
State Representative, 35th District  
[kyrabolden@house.mi.gov](mailto:kyrabolden@house.mi.gov)  
(517) 373-1788

**To:** BPL-BoardSupport@michigan.gov

**RE:** Pending rule set #: 2019-84 LR - Department of Licensing & Regulatory Affairs, Bureau of Professional Licensing

*Title of rule set:* Chiropractic – General Rules     *Rule numbers:* R 338.12001 R 338.12054

To the Policy Analyst and the Michigan Board of Chiropractic:

I am reaching out on behalf of my constituents regarding the upcoming January 19, 2021 Public Hearing on the rule numbers: R 338.12001 R 338.12054. I would appreciate your replies to the following questions about the proposed Chiropractic rules changes:

- 1.) The proposed rules would give the Michigan Association of Chiropractors (M.A.C.) the role of review and approval of Chiropractic Continuing Education (C.E.) programming in Michigan. The M.A.C. offers C.E. courses which may potentially conflict with other organizations and businesses that the M.A.C. may oversee. Does the Board have any processes or procedures in place to handle a potential conflict of interest?
- 2.) Will there be any checks and balances on M.A.C. as the overseer of Chiropractic Continuing Education? Will there be a concurrent application process directly to the Board of Chiropractic for applications as well?
- 3.) What is the rationale behind M.A.C. being granted oversight over other C.E. providers while they are exempted from submitting any application for review? Is there a possibility where M.A.C. can apply to the state Board or to P.A.C.E. for review?
- 5.) Please clarify why the proposed rules restrict off-campus courses to M.A.C. approval.
- 6.) Are there additional benefits to the Board of Chiropractic providing M.A.C. with an oversight role?
- 7.) How would you address an individual's concerns about the M.A.C being elevated to this oversight role as a non-regulatory, non-governmental, membership organization?

Thank you for taking the time to look over our questions. Any clarification that the Board could provide on the matter would be greatly appreciated.

In service,

Representative Kyra Bolden  
State Representative, 35th District  
[kyrabolden@house.mi.gov](mailto:kyrabolden@house.mi.gov)  
(517) 373-1788

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Public Hearing of Jan. 19, 2021 on Chiropractic rules  
**Date:** Monday, January 18, 2021 2:28:20 PM  
**Attachments:** [M.B. letter to State Board 1-2021.docx](#)  
[Attachment to Letter to Board 01-2021 PACE Info.docx](#)

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**From:** Martin Brown <blestday@yahoo.com>  
**Sent:** Thursday, January 14, 2021 2:17 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Public Hearing of Jan. 19, 2021 on Chiropractic rules

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To: [BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)

**RE:** Public Hearing of Jan. 19, 2021  
Department of Licensing & Regulatory Affairs, Bureau  
of Professional Licensing  
*Title of rule set:* Chiropractic – General Rules  
*Rule set #:* 2019-84 LR *Rule numbers:* R 338.12001 R  
338.12054

To the Policy Analyst and the Michigan Board of Chiropractic:

I am writing to express my views for the Public Hearing on the matter referenced above. I oppose the Board of Chiropractic granting authority over the review and approval of Continuing Education to the Michigan Association of Chiropractors (M.A.C.) This is not common in other professions in Michigan nor is this common in other state's Chiropractic Boards. This option is very questionable and controversial.

I am a loyal, longstanding dues-paid member of the M.A.C. and of its predecessor organizations since the 1980's. I have consistently attended M.A.C. conventions and events for over 35 years. I recognize the M.A.C.'s fine efforts in their role of serving members and promoting the profession but there are limits on their roles and duties.

M.A.C. is a non-regulatory, non-governmental membership trade organization and should **not** be given a regulatory role. Chiropractors are not required to join M.A.C. The state Board's primary obligation is to protect the health, safety, and welfare of the public. M.A.C.'s role is to serve its members. These are different and separate roles and the distinction should remain.

M.A.C. holds continuing education programs and derives significant income from these programs. There is a clear **conflict of interest** if M.A.C. were to oversee all other provider entities offering Continuing Education (C.E.) in Michigan. The proposed Board rules provide **no** oversight, **no** checks and balances on M.A.C. whatsoever. In fact, M.A.C. has been placed 'above the rules' with **no** required application or review or approval required for their own C.E. programs. Historically, only a sovereign monarch would hold such unchecked power and

control over others. No fair rationale exists for M.A.C. courses **not** being impartially reviewed and approved. I do not doubt the validity of M.A.C. programs but I oppose an unequal review process.

The national organization F.C.L.B. (Federation of Chiropractic Licensing Boards) has established P.A.C.E. (Providers of Approved Continuing Education) with a well-accepted nationwide rigorous review process which is utilized by the vast majority of state Chiropractic Boards. P.A.C.E. is a perfectly suitable Board option for Michigan. I have attached some additional information about P.A.C.E. from their website for your evaluation.

Chiropractic Colleges offer C.E. courses on-campus, online, and off-campus including venues in our state. There are **no** Chiropractic Colleges in the state of Michigan. Off-campus C.E. courses offered by Chiropractic Colleges given in **any** location should be automatically approved just as on-campus courses. The Covid pandemic has taught us about valid and realistic flexible educational options. All major universities now offer online courses to protect students from coronavirus exposure. Especially in this pandemic era, Chiropractic C.E. should become more accessible, not further encumbered. There is no reason to require risky travel out-of-state for Michigan Chiropractors or to have M.A.C. review a College course no matter where the course is taught. The Board must always focus on its role of protecting the public. Adding M.A.C. review of College off-campus programs does not serve the public.

The State of Michigan must preserve fair authority over all aspects of government, including actions of the Board of Chiropractic. This letter is written in the name of fairness, equal justice and ethical principles.

*A fair solution alternative:* Perhaps a concurrent application process directly to the Board, as has been the standard since the initiation of mandatory C.E., with a limit of five (5) applications per year per sponsoring entity. This would provide a reasonable option to the Board. P.A.C.E. would effectively handle those submitting larger volumes of courses for review. This way the Board's work would be reduced but the Board would retain oversight on C.E. while P.A.C.E. could fairly handle applications for entities offering numerous C.E. programs. I suggest that the Board endorse **multiple options** for C.E. review and approval as well as automatic approval for accredited Chiropractic college programs regardless of where the course is offered, either on-campus, online, or off-campus.

Thank you very much for your consideration.

Sincerely,  
Martin J. Brown, D.C.  
President,  
Macomb County Chiropractic Association

[BLESTDAY@yahoo.com](mailto:BLESTDAY@yahoo.com)

Note: Attachment

To: BPL-BoardSupport@michigan.gov

RE: Public Hearing of Jan. 19, 2021

Department of Licensing & Regulatory Affairs, Bureau of Professional Licensing

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Thank you very much for your consideration.

Sincerely,

Martin J. Brown, D.C.  
President,  
Macomb County Chiropractic Association  
[BLESTDAY@yahoo.com](mailto:BLESTDAY@yahoo.com)

Note: Attachment

*The following pages are all from the F.C.L.B. website:*

## **Chiropractic P.A.C.E.**

# **Providers of Approved Continuing Education**

PACE (**Providers of Approved Continuing Education**) is the signature program of the Federation of Chiropractic Licensing Board (FCLB). The resonating mission of the FCLB is to protect the public by promoting excellence in chiropractic regulation through service to their member boards. The FCLB encourages regulatory boards to employ best practices in public protection, communicate and network to improve capability, develop consistency in standards, and envision a plan for the future.

A large part of this protection is the promotion and facilitation of the **PACE chiropractic continuing education program**. PACE recognized continuing education courses promote quality chiropractic continuing education programs, provide reliable and scientifically sound educational updates, help chiropractors remain current on licensing and new, effective clinical protocols, and help practitioners avoid isolation through peer-related educational activities.

The PACE continuing education program streamlines chiropractic continuing education course requirements and is administered by the FCLB. The PACE program reduces onerous paperwork and review processes, provides reliable reports on fulfillment of re-licensing requirements, and helps boards replace with audits for compliance.

A primary focus of the PACE continuing education program was to streamline this essential regulatory requirement. Before PACE, there was little consistency in **chiropractic continuing education** approval processes.

Through this program, PACE achieves excellence in maintaining consistency for regulatory boards, providers, chiropractic practitioners, and professional associations.

## **Snapshot of PACE Benefits:**

**For CE Providers** – single, simplified application process, uniform criteria for approval, automatic course approval, professional credibility.

**For Regulatory Boards** – economies of scale, informed, professional evaluations, automatic credit reporting, simplified CE approval process.

**For Practicing D.C.s** – automatic attendance verification, easy course searching, simplified course assessment, the affirmation of quality!

## **Benefits of PACE for Regulatory Boards**

The primary offering of the PACE chiropractic continuing education program is confidence in course quality. Each PACE recognized program offered in the chiropractic continuing education catalog is assessed by postgraduate chiropractic education and regulatory review experts. These experts are responsible for evaluating the provider's ability and willingness to comply with stringent PACE criteria and for conducting retrospective course reviews to ensure continued compliance. Additionally, representatives participate in on-site audits to ensure quality control and course integrity.

Through the streamlined PACE chiropractic continuing education requirements, regulatory boards no longer need to deal with stacks of course applications. PACE providers have already been reviewed for compliance with PACE standards. Additionally, regulatory boards save money and time otherwise spent assessing applications from reliable, quality providers. Furthermore, PACE has the flexibility to accommodate new technologies in attendance verification, allowing providers to use an efficient system that meets PACE quality standards.

# Board CE Requirements

Updated 5/14/2020 Click to view the FCLB list of board links

## *Alabama*

Distance Allowed: No more than 6 hours per renewal cycle

2 hrs per year in Alabama Law and Board Rules and Regs

18 hours per 1 year renewal cycle (October 1 - September 30) (Accepts PACE Pre-Check)

## *Alaska*

32 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: No more than 16 hours per renewal cycle

8 hours in diagnostic imaging/X-ray; 2 hours coding and documentation; 2 hours in ethics and boundaries; 2 hours in CPR

*COVID-19 Accommodation:* previously allowed in-person courses can be counted as in-person credits if they are instead offered online during the pandemic. Does not include specific hands-on training (for example, dry needling)

## *Arizona*

12 hours per 1 year renewal cycle (January 1 - December 31) (Accepts PACE Pre-Check)

Distance Allowed: 12 hours of post-graduate mediated instruction through an accredited college or university

Approved subjects: Adjusting techniques; spinal analysis; physical medicine modalities and therapeutic procedures; record keeping and documentation; ethics; CPR; public health; communicable diseases; sexual boundaries; emergency procedures; acupuncture; nutrition; examination, assessment and diagnostic procedures to include physical, orthopedic, neurological procedures; radiographic technique; diagnostic imaging and interpretation; laser as permitted by law; clinical laboratory procedures limited to urine collection, fingerpricks and venipuncture; anatomy; physiology' bacteriology; chiropractic orthopedics and neurology; chemistry; pathology; patient management; evidence-based clinical intervention models; symptomatology; Arizona jurisprudence; participation in the NBCE exam development or administration

## *Arkansas*

24 hours per 1 year renewal cycle

Distance Allowed: 12 hours per renewal cycle

Subject matter defined in statute; requires courses on subject examined for licensure and specialties

## *California*

24 hours per 1 year renewal

Distance Allowed: 12

2 hours in ethics and law; 4 hours in history taking and physical exam procedures, chiropractic adjustive technique, chiropractic manipulation techniques, or proper ethical billing and coding; maximum 12 hours per day; financial management, practice building, and motivation not approved for CE.

*COVID-19 Accommodation:* please check [the board website](#) for information on current CE waivers

#### *Colorado*

15 hours per year (30 per 2 year renewal cycle)

Distance Allowed: 10 hours every 2 years; must include a proficiency test

4 hours every two years in record keeping and documentation; required to maintain Health Provider level CPR (does not pre-approve)

#### *Connecticut*

48 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 48 hours per renewal cycle - must include a self-assessment

Must include 1 hr ethics; 1 hr informed consent; 1 hr risk management, laws & rules, including informed consent; 2 hrs every 6 years in mental health conditions common to veterans and their families (does not pre-approve)

#### *Delaware*

24 hours per 2 year renewal cycle

Distance Allowed: 24 hours per renewal cycle in distance learning that includes live interaction with an instructor; 6 in asynchronous education

Must include 3 hours in ethics, record keeping, or risk management; no practice management

#### *District of Columbia*

24 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 24 hours per renewal cycle

#### *Florida*

40 hours per 2 year renewal cycle (Accepts PACE Precheck for online CE)

Distance Allowed: 10 hours per renewal cycle

- o Three (3) hours of risk management of which two (2) hours must be Florida laws and rules
- o Six (6) hours of record keeping/documentation and coding
- o Two (2) hours in the area of ethics and boundaries
- o For Chiropractic Physicians with Acupuncture Certification – 2 hours in acupuncture safety and risk management and 2 hours in acupuncture technique

#### *Georgia*

20 hours per 1 year (2 year renewal cycle) (Accepts PACE Precheck)

Distance Allowed: 10 hours every year - must be test and time monitored to ensure active participation

15 Chiropractic Clinical Science; 4 ethics or risk management; 1 GA Jurisprudence

#### *Hawaii*

20 hours per 2 year renewal cycle

Distance Allowed: 20 hours

Must be a formal program of learning which will contributed directly to the professional competence of a licensee in public practice (Practice-building NOT approved)

#### *Idaho*

18 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 18 hours per renewal cycle

Licensees MUST read both Rules 350 and 351 to ensure courses are in line with board standards.  
*COVID-19 Accommodations:* if licensees are able to fulfill CE requirements via online courses, they are encouraged to do so. If licensees are not able to obtain CE prior to the renewal deadline, please send a brief statement and any relevant documentation to the Idaho board.

### *Illinois*

150 hours per 3 year renewal cycle

Distance Allowed: 150 hours per renewal cycle

60 hours in "formal," 90 hours in "informal"

*COVID-19 Accommodations:* Renewal dates have been extended

### *Indiana*

24 hours per 2 year renewal cycle / maximum 12 hours per year (Accepts PACE)

Distance Allowed: 0

4 hours of approved courses in public health and/or risk management per year; practice management prohibited

### *Iowa*

40 hours per 2 year renewal cycle (July 1 to June 30) (Accepts PACE)

Distance Allowed: Up to 16 hours in clinical case management per renewal cycle

36 hours in clinical practice (see above for distance limitations); 2 in professional boundaries; 1 hr in Iowa administrative code; 12 in acupuncture if certified

### *Kansas*

15 month update: 50 hours (minimum 20 hours in Cat I); 30 month update: 100 hours (minimum 40 hours in Cat I); 42 month update: 150 hours (minimum 60 hours in Cat I) (Accepts PACE)

Distance Allowed: No limit

Category I: Structured, interactive, formal learning; Category II: Indirectly related to healing arts skills and knowledge (see KS website for more information)

### *Kentucky*

12 hours per 1 year renewal cycle (Accepts PACE Precheck)

Distance Allowed: 0

Courses must be taken over at least two days; 6 hours must be taken within the state of Kentucky; 2 hours of HIV/AIDs required every 10 years

*COVID-19 Accommodations:* Licensees must obtain 12 hours annually. All 12 hours may be completed by a combinations of online (live or recorded) or live in-person CE events through the 2021 relicensing cycle

### *Louisiana*

15 hours per 1 year renewal cycle

Distance Allowed: 0

Must build upon the basic courses required for chiropractic practice; Three (3) hours of risk management, one (1) of which includes ethics.

### *Maine*

48 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 12 hours per renewal cycle

Category 1 - includes documented physical attendance, subject material related to the concepts of chiropractic principles and practice including, but not limited to, diagnostic procedures, patient care and management; Category 2 - includes instruction, writing on health subjects for publication, participation in accreditation and exam programs, self-instruction, peer review, professional self-assessment programs, CPR certification, wellness programs, others as approved by the board

### *Maryland*

48 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 48 hours per renewal cycle

5 hours in risk management including 1 hour in jurisprudence and 3 hours communicable disease training

### *Massachusetts*

12 hours per 1 year renewal cycle (April 1 - May 31) (Accepts PACE)

Distance Allowed: 12 hours per renewal cycle

Allowable subject matter includes clinical proficiency, philosophy and ethics, jurisprudence, or the human and biological sciences; Courses devoted to administrative or economic aspects of practice shall not be approved for continuing education credit.

### *Michigan*

30 hours per 2 year renewal cycle

Distance Allowed: 15 hours per renewal cycle

1 hour in sexual boundaries, 1 hour in ethics, and 1 hour in pain and symptom management; 2 live, in-person hours in physical measures and 2 live, in-person hours in performance and ordering of tests

### *Minnesota*

20 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 20 hours per renewal cycle

20-hour requirement must include 3 hours in radiology/advanced imaging, 1 hour in professional boundaries, 2 hours in acupuncture (if registered), 6 hours in addition to the 20 hours in animal chiropractic (if registered). Note professional boundaries refers to preserving the Doctor/Patient relationship.

*COVID-19 Accommodations:* The Minnesota Health Licensing Boards are jointly promoting a deferral of CE requirements until the first renewal period after the COVID-19 emergency ends. However, since chiropractic renewals are not until the end of the year, and we allow all CE to be obtained by alternative means, i.e. online, video, CD, etc., it is not expected to affect chiropractors in Minnesota

### *Mississippi*

12 hours per 1 year renewal cycle (July 1 - June 30)

Distance Allowed: 0

3 hours in risk management

### *Missouri*

48 hours per 2 year renewal cycle

Distance Allowed: 48 hours per renewal cycle - must be board approved

24 hours of formal, board-approved CE in at least 3 of the 16 recognized categories (see MO website); self-study, meetings, publishing, presentations, etc. allowed for up to 24 hours of credit

### *Montana*

13 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 13 hours per renewal cycle

No more than 2 hours of philosophy or practice management; 1 hour of professional ethics and boundaries required

### *Nebraska*

36 hours per 2 year renewal cycle (August 1 - July 31) (Accepts PACE)

Distance Allowed: 6 hours per renewal cycle

Must complete 4 hours of technical skills in x-ray or adjustive techniques; and 4 hours in HIV/Aids, infectious diseases; boundary training; Nebraska scope; lab testing and interpretation; physical, neurological and orthopedic exam; fraud prevention; rehab; ethics; or use of unlicensed personnel. Maximum 8 hours CE per day. Does not pre-approve; acceptable programs/activities available on NE website (page 17).

### *Nevada*

36 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 36 hours per renewal cycle

No practice-building or insurance-billing

### *New Hampshire*

20 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: No more than 25% of the total hours (currently 5 hours per renewal cycle)

Business courses specifically excluded; maximum 10 hours credit per day.

### *New Jersey*

30 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 12 in asynchronous distance learning; or 30 in synchronous distance learning

2 hours in state laws regarding ethics or record keeping; 2 hours in nutrition education; maximum 10 hours of CE per day

### *New Mexico*

16 hours per 1 year renewal cycle (July 1 - June 30) (accepts PACE Precheck)

Distance Allowed: 8 hours per renewal cycle unless specific approval is obtained

Additional hours may be required by the board; NOTE: 1 credit = 60 full minutes of education

*COVID-19 Accommodations:* License renewals will be processed without proof of CE. Licenses without sufficient CE will be required to give notice to the board or commission through procedures established by the Public Email Notice on March 17, 2020. If all other license renewal requirements are met, licenses will be renewed without proof of CE credits. When the public health emergency is lifted, Boards and Commissions staff will send out a notice to licensees stating that the licensee has 6 months to

submit their proof of CE or be subject to discipline by the Board.

#### *New York*

36 hours per 3 year renewal cycle

Distance Allowed: 12 hours per renewal cycle

One time 2-hour course in child abuse reporting required; at least 12 hours in patient communications, record keeping, and matters of law and/or ethics

#### *North Carolina*

18 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 8 hours per renewal cycle

2 hours in coding; 2 hour in compliance; 2 hours in documentation; 2 hours in ethics; 2 hours in sexual boundaries; 2 hours in NC jurisprudence every 5 years

#### *North Dakota*

20 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 20 hours per renewal cycle

4 hours of professional boundaries every 3 years; for licensees authorized to practice acupuncture, 2 hours of acupuncture CE required

#### *Ohio*

36 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 36 hours

2 hours on ethics or professionalism, human trafficking awareness, laws and rules of the board Topics related to billing and coding, risk management, malpractice defense, legal courses, and practice building are not eligible for CE.

#### *Oklahoma*

16 hours per 1 year renewal cycle (Accepts PACE Precheck)

Distance Allowed: 8

12 hours must be clinical in nature; 8 hours must be earned in-state through an Oklahoma state association

*COVID-19 Accommodations:* The Board approved an extension of continuing education hours for the current renewal period of 2020-2021. The licensee will have until June 30, 2021 to submit current renewal hours along with next year's license renewal hours once they have submitted the Non-attendance waiver. They will still need to pay for license renewal on or before June 30, 2020 to have their license renewed but with the submission of the waiver that grants them additional time on obtaining the required CE. The board has also removed the 90 day postmark deadline for CEs to be submitted by state associations and other entities who make application to have CEs approved by the board. This will allow for more CEs to be available for the licensee in-state, and more opportunities for the licensee to do 8 of the 16 out-of-state or online

### *Oregon*

20 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 20 hours per renewal cycle

All first time licensees and those changing status from inactive to active must complete 4 hours in over-the-counter non-prescriptive substances

### *Pennsylvania*

24 hours per 2 year renewal cycle (September 1 - August 31)

Distance Allowed: 24 hours per renewal cycle

### *Rhode Island*

60 hours per 3 year registration cycle (Accepts PACE)

Distance Allowed: 30 hours per registration cycle

50 hours in clinically-related courses

### *South Carolina*

36 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 18 hours per renewal cycle

2 hours SC rules and regs; 2 hrs risk management

### *South Dakota*

40 hours per 2 years (January 1 to December 31) (Accepts PACE)

Distance Allowed: 40 hours per 2 years; online courses MUST include an end of seminar quiz with at least a 70% passing score required.

DCs must maintain current CPR certification; 8 hours acupuncture required if certified.

### *Tennessee*

24 hours per 1 year (Accepts PACE)

Distance Allowed: 6 hours per 1 year

3 hours sexual boundaries training; 3 hours AIDS awareness/risk prevention (first year); For licensees with acupuncture certification, 6 hours of acupuncture are required. Philosophy is not allowed for CE.

### *Texas*

16 hours per 1 year renewal cycle (Accepts PACE Pre-Check for chiropractic colleges)

Distance Allowed: 10 hours per renewal cycle

The board will designate a minimum of four hours as "TBCE Required Courses" which must be taken live: three hours in board rules including, ethics, recordkeeping, documentation, and coding; a minimum of one hour in risk management in chiropractic practice.

*COVID-19 Accommodations:* 10 hours are allowed online. The additional six may be earned via interactive webinar.

### *Utah*

40 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 10 hours per renewal cycle

No more than 4 hours of marketing or practice building; licensees who practice acupuncture must complete 10 hours of acupuncture

*COVID-19 Accommodations:* Live requirements are suspended. Online or distance learning are acceptable for all 40 hours required

### *Vermont*

24 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 24 per renewal cycle

Practice management, finance, and philosophy prohibited

### *Virginia*

60 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: Not specified

Minimum 30 hours in Type 1 (approved by board); maximum 30 hours Type 2 (not approved by board)

### *Washington*

25 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 12 hours per renewal cycle

Diagnosis and treatment of the spine or immediate articulations within the scope of practice; X-ray/diagnostic imaging; Adjustive technique; Detection of a subluxation; Physical examination; Hygiene; Symptomatology; Neurology; Pathology; Orthopedics; Patient/case management; Impairment within the scope of practice; CPR; Dietary and nutrition advice; and Chiropractic philosophy and business management (not to exceed a total of 8 hours) 1-time requirement: 3 hrs suicide prevention screening

*COVID-19 Accommodations:* Expiration dates extended. Visit board website for more information

### *West Virginia*

18 hours per 1 year renewal cycle

Distance Allowed: 6 hours per renewal cycle

*COVID-19 Accommodations:* All 18 allowed online for current renewal cycle

### *Wisconsin*

40 hours per 2 year renewal cycle

Distance Allowed: 0

Must maintain current CPR certification; Chiropractors with nutritional counseling certificates must complete at least 4 hours of nutrition CE; 1 hour of coursework to become proficient in the use of an automated external defibrillator required.

### *Wyoming*

12 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 4

*COVID-19 Accommodations:* Emergency rules instated to lift cap on online CE

*Puerto Rico*

45 hours per 3 years (Accepts PACE)

Distance Allowed: 15

*The following pages are all from the F.C.L.B. website:*

## **Chiropractic P.A.C.E.**

# **Providers of Approved Continuing Education**

PACE (**Providers of Approved Continuing Education**) is the signature program of the Federation of Chiropractic Licensing Board (FCLB). The resonating mission of the FCLB is to protect the public by promoting excellence in chiropractic regulation through service to their member boards. The FCLB encourages regulatory boards to employ best practices in public protection, communicate and network to improve capability, develop consistency in standards, and envision a plan for the future.

A large part of this protection is the promotion and facilitation of the **PACE chiropractic continuing education program**. PACE recognized continuing education courses promote quality chiropractic continuing education programs, provide reliable and scientifically sound educational updates, help chiropractors remain current on licensing and new, effective clinical protocols, and help practitioners avoid isolation through peer-related educational activities.

The PACE continuing education program streamlines chiropractic continuing education course requirements and is administered by the FCLB. The PACE program reduces onerous paperwork and review processes, provides reliable reports on fulfillment of re-licensing requirements, and helps boards replace with audits for compliance.

A primary focus of the PACE continuing education program was to streamline this essential regulatory requirement. Before PACE, there was little consistency in **chiropractic continuing education** approval processes.

Through this program, PACE achieves excellence in maintaining consistency for regulatory boards, providers, chiropractic practitioners, and professional associations.

## **Snapshot of PACE Benefits:**

**For CE Providers** – single, simplified application process, uniform criteria for approval, automatic course approval, professional credibility.

**For Regulatory Boards** – economies of scale, informed, professional evaluations, automatic credit reporting, simplified CE approval process.

**For Practicing D.C.s** – automatic attendance verification, easy course searching, simplified course assessment, the affirmation of quality!

## **Benefits of PACE for Regulatory Boards**

The primary offering of the PACE chiropractic continuing education program is confidence in course quality. Each PACE recognized program offered in the chiropractic continuing education catalog is assessed by postgraduate chiropractic education and regulatory review experts. These experts are responsible for evaluating the provider's ability and willingness to comply with stringent PACE criteria and for conducting retrospective course reviews to ensure continued compliance. Additionally, representatives participate in on-site audits to ensure quality control and course integrity.

Through the streamlined PACE chiropractic continuing education requirements, regulatory boards no longer need to deal with stacks of course applications. PACE providers have already been reviewed for compliance with PACE standards. Additionally, regulatory boards save money and time otherwise spent assessing applications from reliable, quality providers. Furthermore, PACE has the flexibility to accommodate new technologies in attendance verification, allowing providers to use an efficient system that meets PACE quality standards.

# Board CE Requirements

Updated 5/14/2020 Click to view the FCLB list of board links

## *Alabama*

Distance Allowed: No more than 6 hours per renewal cycle

2 hrs per year in Alabama Law and Board Rules and Regs

18 hours per 1 year renewal cycle (October 1 - September 30) (Accepts PACE Pre-Check)

## *Alaska*

32 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: No more than 16 hours per renewal cycle

8 hours in diagnostic imaging/X-ray; 2 hours coding and documentation; 2 hours in ethics and boundaries; 2 hours in CPR

*COVID-19 Accommodation:* previously allowed in-person courses can be counted as in-person credits if they are instead offered online during the pandemic. Does not include specific hands-on training (for example, dry needling)

## *Arizona*

12 hours per 1 year renewal cycle (January 1 - December 31) (Accepts PACE Pre-Check)

Distance Allowed: 12 hours of post-graduate mediated instruction through an accredited college or university

Approved subjects: Adjusting techniques; spinal analysis; physical medicine modalities and therapeutic procedures; record keeping and documentation; ethics; CPR; public health; communicable diseases; sexual boundaries; emergency procedures; acupuncture; nutrition; examination, assessment and diagnostic procedures to include physical, orthopedic, neurological procedures; radiographic technique; diagnostic imaging and interpretation; laser as permitted by law; clinical laboratory procedures limited to urine collection, fingerpricks and venipuncture; anatomy; physiology' bacteriology; chiropractic orthopedics and neurology; chemistry; pathology; patient management; evidence-based clinical intervention models; symptomatology; Arizona jurisprudence; participation in the NBCE exam development or administration

## *Arkansas*

24 hours per 1 year renewal cycle

Distance Allowed: 12 hours per renewal cycle

Subject matter defined in statute; requires courses on subject examined for licensure and specialties

## *California*

24 hours per 1 year renewal

Distance Allowed: 12

2 hours in ethics and law; 4 hours in history taking and physical exam procedures, chiropractic adjustive technique, chiropractic manipulation techniques, or proper ethical billing and coding; maximum 12 hours per day; financial management, practice building, and motivation not approved for CE.

*COVID-19 Accommodation:* please check [the board website](#) for information on current CE waivers

#### *Colorado*

15 hours per year (30 per 2 year renewal cycle)

Distance Allowed: 10 hours every 2 years; must include a proficiency test

4 hours every two years in record keeping and documentation; required to maintain Health Provider level CPR (does not pre-approve)

#### *Connecticut*

48 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 48 hours per renewal cycle - must include a self-assessment

Must include 1 hr ethics; 1 hr informed consent; 1 hr risk management, laws & rules, including informed consent; 2 hrs every 6 years in mental health conditions common to veterans and their families (does not pre-approve)

#### *Delaware*

24 hours per 2 year renewal cycle

Distance Allowed: 24 hours per renewal cycle in distance learning that includes live interaction with an instructor; 6 in asynchronous education

Must include 3 hours in ethics, record keeping, or risk management; no practice management

#### *District of Columbia*

24 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 24 hours per renewal cycle

#### *Florida*

40 hours per 2 year renewal cycle (Accepts PACE Precheck for online CE)

Distance Allowed: 10 hours per renewal cycle

- o Three (3) hours of risk management of which two (2) hours must be Florida laws and rules
- o Six (6) hours of record keeping/documentation and coding
- o Two (2) hours in the area of ethics and boundaries
- o For Chiropractic Physicians with Acupuncture Certification – 2 hours in acupuncture safety and risk management and 2 hours in acupuncture technique

#### *Georgia*

20 hours per 1 year (2 year renewal cycle) (Accepts PACE Precheck)

Distance Allowed: 10 hours every year - must be test and time monitored to ensure active participation

15 Chiropractic Clinical Science; 4 ethics or risk management; 1 GA Jurisprudence

#### *Hawaii*

20 hours per 2 year renewal cycle

Distance Allowed: 20 hours

Must be a formal program of learning which will contributed directly to the professional competence of a licensee in public practice (Practice-building NOT approved)

#### *Idaho*

18 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 18 hours per renewal cycle

Licensees MUST read both Rules 350 and 351 to ensure courses are in line with board standards.  
*COVID-19 Accommodations:* if licensees are able to fulfill CE requirements via online courses, they are encouraged to do so. If licensees are not able to obtain CE prior to the renewal deadline, please send a brief statement and any relevant documentation to the Idaho board.

### *Illinois*

150 hours per 3 year renewal cycle  
Distance Allowed: 150 hours per renewal cycle  
60 hours in "formal," 90 hours in "informal"  
*COVID-19 Accommodations:* Renewal dates have been extended

### *Indiana*

24 hours per 2 year renewal cycle / maximum 12 hours per year (Accepts PACE)  
Distance Allowed: 0  
4 hours of approved courses in public health and/or risk management per year; practice management prohibited

### *Iowa*

40 hours per 2 year renewal cycle (July 1 to June 30) (Accepts PACE)  
Distance Allowed: Up to 16 hours in clinical case management per renewal cycle  
36 hours in clinical practice (see above for distance limitations); 2 in professional boundaries; 1 hr in Iowa administrative code; 12 in acupuncture if certified

### *Kansas*

15 month update: 50 hours (minimum 20 hours in Cat I); 30 month update: 100 hours (minimum 40 hours in Cat I); 42 month update: 150 hours (minimum 60 hours in Cat I) (Accepts PACE)  
Distance Allowed: No limit  
Category I: Structured, interactive, formal learning; Category II: Indirectly related to healing arts skills and knowledge (see KS website for more information)

### *Kentucky*

12 hours per 1 year renewal cycle (Accepts PACE Precheck)  
Distance Allowed: 0  
Courses must be taken over at least two days; 6 hours must be taken within the state of Kentucky; 2 hours of HIV/AIDs required every 10 years  
*COVID-19 Accommodations:* Licensees must obtain 12 hours annually. All 12 hours may be completed by a combinations of online (live or recorded) or live in-person CE events through the 2021 relicensing cycle

### *Louisiana*

15 hours per 1 year renewal cycle  
Distance Allowed: 0  
Must build upon the basic courses required for chiropractic practice; Three (3) hours of risk management, one (1) of which includes ethics.

### *Maine*

48 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 12 hours per renewal cycle

Category 1 - includes documented physical attendance, subject material related to the concepts of chiropractic principles and practice including, but not limited to, diagnostic procedures, patient care and management; Category 2 - includes instruction, writing on health subjects for publication, participation in accreditation and exam programs, self-instruction, peer review, professional self-assessment programs, CPR certification, wellness programs, others as approved by the board

### *Maryland*

48 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 48 hours per renewal cycle

5 hours in risk management including 1 hour in jurisprudence and 3 hours communicable disease training

### *Massachusetts*

12 hours per 1 year renewal cycle (April 1 - May 31) (Accepts PACE)

Distance Allowed: 12 hours per renewal cycle

Allowable subject matter includes clinical proficiency, philosophy and ethics, jurisprudence, or the human and biological sciences; Courses devoted to administrative or economic aspects of practice shall not be approved for continuing education credit.

### *Michigan*

30 hours per 2 year renewal cycle

Distance Allowed: 15 hours per renewal cycle

1 hour in sexual boundaries, 1 hour in ethics, and 1 hour in pain and symptom management; 2 live, in-person hours in physical measures and 2 live, in-person hours in performance and ordering of tests

### *Minnesota*

20 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 20 hours per renewal cycle

20-hour requirement must include 3 hours in radiology/advanced imaging, 1 hour in professional boundaries, 2 hours in acupuncture (if registered), 6 hours in addition to the 20 hours in animal chiropractic (if registered). Note professional boundaries refers to preserving the Doctor/Patient relationship.

*COVID-19 Accommodations:* The Minnesota Health Licensing Boards are jointly promoting a deferral of CE requirements until the first renewal period after the COVID-19 emergency ends. However, since chiropractic renewals are not until the end of the year, and we allow all CE to be obtained by alternative means, i.e. online, video, CD, etc., it is not expected to affect chiropractors in Minnesota

### *Mississippi*

12 hours per 1 year renewal cycle (July 1 - June 30)

Distance Allowed: 0

3 hours in risk management

### *Missouri*

48 hours per 2 year renewal cycle

Distance Allowed: 48 hours per renewal cycle - must be board approved

24 hours of formal, board-approved CE in at least 3 of the 16 recognized categories (see MO website); self-study, meetings, publishing, presentations, etc. allowed for up to 24 hours of credit

### *Montana*

13 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 13 hours per renewal cycle

No more than 2 hours of philosophy or practice management; 1 hour of professional ethics and boundaries required

### *Nebraska*

36 hours per 2 year renewal cycle (August 1 - July 31) (Accepts PACE)

Distance Allowed: 6 hours per renewal cycle

Must complete 4 hours of technical skills in x-ray or adjustive techniques; and 4 hours in HIV/Aids, infectious diseases; boundary training; Nebraska scope; lab testing and interpretation; physical, neurological and orthopedic exam; fraud prevention; rehab; ethics; or use of unlicensed personnel. Maximum 8 hours CE per day. Does not pre-approve; acceptable programs/activities available on NE website (page 17).

### *Nevada*

36 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 36 hours per renewal cycle

No practice-building or insurance-billing

### *New Hampshire*

20 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: No more than 25% of the total hours (currently 5 hours per renewal cycle)

Business courses specifically excluded; maximum 10 hours credit per day.

### *New Jersey*

30 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 12 in asynchronous distance learning; or 30 in synchronous distance learning

2 hours in state laws regarding ethics or record keeping; 2 hours in nutrition education; maximum 10 hours of CE per day

### *New Mexico*

16 hours per 1 year renewal cycle (July 1 - June 30) (accepts PACE Precheck)

Distance Allowed: 8 hours per renewal cycle unless specific approval is obtained

Additional hours may be required by the board; NOTE: 1 credit = 60 full minutes of education

*COVID-19 Accommodations:* License renewals will be processed without proof of CE. Licenses without sufficient CE will be required to give notice to the board or commission through procedures established by the Public Email Notice on March 17, 2020. If all other license renewal requirements are met, licenses will be renewed without proof of CE credits. When the public health emergency is lifted, Boards and Commissions staff will send out a notice to licensees stating that the licensee has 6 months to

submit their proof of CE or be subject to discipline by the Board.

#### *New York*

36 hours per 3 year renewal cycle

Distance Allowed: 12 hours per renewal cycle

One time 2-hour course in child abuse reporting required; at least 12 hours in patient communications, record keeping, and matters of law and/or ethics

#### *North Carolina*

18 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 8 hours per renewal cycle

2 hours in coding; 2 hour in compliance; 2 hours in documentation; 2 hours in ethics; 2 hours in sexual boundaries; 2 hours in NC jurisprudence every 5 years

#### *North Dakota*

20 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 20 hours per renewal cycle

4 hours of professional boundaries every 3 years; for licensees authorized to practice acupuncture, 2 hours of acupuncture CE required

#### *Ohio*

36 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 36 hours

2 hours on ethics or professionalism, human trafficking awareness, laws and rules of the board Topics related to billing and coding, risk management, malpractice defense, legal courses, and practice building are not eligible for CE.

#### *Oklahoma*

16 hours per 1 year renewal cycle (Accepts PACE Precheck)

Distance Allowed: 8

12 hours must be clinical in nature; 8 hours must be earned in-state through an Oklahoma state association

*COVID-19 Accommodations:* The Board approved an extension of continuing education hours for the current renewal period of 2020-2021. The licensee will have until June 30, 2021 to submit current renewal hours along with next year's license renewal hours once they have submitted the Non-attendance waiver. They will still need to pay for license renewal on or before June 30, 2020 to have their license renewed but with the submission of the waiver that grants them additional time on obtaining the required CE. The board has also removed the 90 day postmark deadline for CEs to be submitted by state associations and other entities who make application to have CEs approved by the board. This will allow for more CEs to be available for the licensee in-state, and more opportunities for the licensee to do 8 of the 16 out-of-state or online

### *Oregon*

20 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 20 hours per renewal cycle

All first time licensees and those changing status from inactive to active must complete 4 hours in over-the-counter non-prescriptive substances

### *Pennsylvania*

24 hours per 2 year renewal cycle (September 1 - August 31)

Distance Allowed: 24 hours per renewal cycle

### *Rhode Island*

60 hours per 3 year registration cycle (Accepts PACE)

Distance Allowed: 30 hours per registration cycle

50 hours in clinically-related courses

### *South Carolina*

36 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 18 hours per renewal cycle

2 hours SC rules and regs; 2 hrs risk management

### *South Dakota*

40 hours per 2 years (January 1 to December 31) (Accepts PACE)

Distance Allowed: 40 hours per 2 years; online courses MUST include an end of seminar quiz with at least a 70% passing score required.

DCs must maintain current CPR certification; 8 hours acupuncture required if certified.

### *Tennessee*

24 hours per 1 year (Accepts PACE)

Distance Allowed: 6 hours per 1 year

3 hours sexual boundaries training; 3 hours AIDS awareness/risk prevention (first year); For licensees with acupuncture certification, 6 hours of acupuncture are required. Philosophy is not allowed for CE.

### *Texas*

16 hours per 1 year renewal cycle (Accepts PACE Pre-Check for chiropractic colleges)

Distance Allowed: 10 hours per renewal cycle

The board will designate a minimum of four hours as "TBCE Required Courses" which must be taken live: three hours in board rules including, ethics, recordkeeping, documentation, and coding; a minimum of one hour in risk management in chiropractic practice.

*COVID-19 Accommodations:* 10 hours are allowed online. The additional six may be earned via interactive webinar.

### *Utah*

40 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 10 hours per renewal cycle

No more than 4 hours of marketing or practice building; licensees who practice acupuncture must complete 10 hours of acupuncture

*COVID-19 Accommodations:* Live requirements are suspended. Online or distance learning are acceptable for all 40 hours required

### *Vermont*

24 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: 24 per renewal cycle

Practice management, finance, and philosophy prohibited

### *Virginia*

60 hours per 2 year renewal cycle (Accepts PACE)

Distance Allowed: Not specified

Minimum 30 hours in Type 1 (approved by board); maximum 30 hours Type 2 (not approved by board)

### *Washington*

25 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 12 hours per renewal cycle

Diagnosis and treatment of the spine or immediate articulations within the scope of practice; X-ray/diagnostic imaging; Adjustive technique; Detection of a subluxation; Physical examination; Hygiene; Symptomatology; Neurology; Pathology; Orthopedics; Patient/case management; Impairment within the scope of practice; CPR; Dietary and nutrition advice; and Chiropractic philosophy and business management (not to exceed a total of 8 hours) 1-time requirement: 3 hrs suicide prevention screening

*COVID-19 Accommodations:* Expiration dates extended. Visit board website for more information

### *West Virginia*

18 hours per 1 year renewal cycle

Distance Allowed: 6 hours per renewal cycle

*COVID-19 Accommodations:* All 18 allowed online for current renewal cycle

### *Wisconsin*

40 hours per 2 year renewal cycle

Distance Allowed: 0

Must maintain current CPR certification; Chiropractors with nutritional counseling certificates must complete at least 4 hours of nutrition CE; 1 hour of coursework to become proficient in the use of an automated external defibrillator required.

### *Wyoming*

12 hours per 1 year renewal cycle (Accepts PACE)

Distance Allowed: 4

*COVID-19 Accommodations:* Emergency rules instated to lift cap on online CE

*Puerto Rico*

45 hours per 3 years (Accepts PACE)

Distance Allowed: 15

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: continuing chiro ed.  
**Date:** Monday, January 11, 2021 7:16:20 AM

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-----Original Message-----

From: drbrown20@netzero.net <drbrown20@netzero.net>  
Sent: Saturday, January 9, 2021 1:12 PM  
To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
Subject: continuing chiro ed.

CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no "checks and balances" over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should not be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus OR Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail. Thank you very much.

Sincerely,

Name: Dr. Steven Brown Email Address:  
drbrown20@netzero.net

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: continuing education  
**Date:** Tuesday, January 12, 2021 8:25:21 AM

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**From:** Richard Burke <burkechiro1@yahoo.com>  
**Sent:** Tuesday, January 12, 2021 8:09 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** continuing education

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To whom it may concern:

As a practicing doctor of chiropractic in the state of Michigan for forty years it is very important to have freedom of

choice as to where and when I obtain my licensing requirements.

To grant a political organization the ability to control the process is not American nor democratic. Also, by doing so

the monetary structure is in their control as well.

Chiropractically,

Richard A. Burke D.C.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Continuing Education  
**Date:** Monday, January 11, 2021 7:22:15 AM

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**From:** Darlene Button <dbuttondcmacfeel@hotmail.com>  
**Sent:** Monday, January 11, 2021 6:44 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Continuing Education

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I am a member of the MAC, but do not understand why the board intends to make this body the one to control CE approval for Michigan Chiropractors. I find it unethical that a group which offers CE classes should be able to determine if other CE providers should be approved. I willing to bet that at least fifty percent of Michigan chiropractors would prefer not to see us begin to structure out governing bodies after China or Russia.

Dr. Button

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**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Opinion opposing the consideration of the M.A.C.'s sole authority over C.E. credits.  
**Date:** Wednesday, January 6, 2021 7:03:14 AM

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**From:** Jess Cohen <drjessucc@gmail.com>  
**Sent:** Tuesday, January 5, 2021 5:44 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Opinion opposing the consideration of the M.A.C.'s sole authority over C.E. credits.

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To the Policy Analyst of the State of Michigan and the Board of Chiropractic,

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors(M.A.C.) sole authority over continuing education. The board should maintain the distinction between a membership-based professional trade association (the M.A.C), as opposed to a governmental regulatory body. There is a potential conflict of interest as the MAC offers continuing education courses and may view other CE providers as competitors. There are no 'check and balances' over the authority being offered the MAC.

There are more fair and reasonable options that should be acceptable to the board. The majority of state boards in this country utilize Providers of Approved Continuing Education(P.A.C.E.) of the FCLB(Federation of chiropractic licensing boards). PACE offers a rigor established review process of CE approved organizations.

The Michigan Association of Chiropractors should NOT be granted automatic CE approval. All C.E. provider organization should apply and be reviewed by the state board, by PACE or both. There must be independent oversight. Why is MAC above the rules? If the MAC is automatically approved, the MCCA(MACOMB COUNTY CHIROPRACTIC ASSOCIATION) should also be automatically approved for their annual C.E. seminar.

Chiropractic College CE courses should be automatically approved whether the classes re offered on campus or off campus. The pandemic has shown us that education diversity is valid and useful. There is no reason that an identical course should only be approved ON-CAMPUS, forcing Michigan chiropractors to travel at added risk and expense. THIS WOULD ONLY SERVE TO ENRICH THE M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. The state board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.

Thank you very much.

Jessica Cohen, DC

Utica Chiropractic Clinic  
45200 Sterritt St. Suite 102  
Utica, MI 48317  
P (586)739-6080  
F (586)739-2797  
[drjessucc@gmail.com](mailto:drjessucc@gmail.com)

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**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Continuing Education  
**Date:** Wednesday, January 6, 2021 7:03:04 AM

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**From:** Utica Chiropractic <theuticachiro@gmail.com>  
**Sent:** Tuesday, January 5, 2021 5:38 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic Continuing Education

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There are more fair and reasonable options that should be acceptable to the board. The majority of state boards in this country utilize Providers of Approved Continuing Education(P.A.C.E.) of the FCLB(Federation of chiropractic licensing boards). PACE offers a rigor established review process of CE approved organizations.

The Michigan Association of Chiropractors should NOT be granted automatic CE approval. All C.E. provider organization should apply and be reviewed by the state board, by PACE or both. There must be independent oversight. Why is MAC above the rules? If the MAC is automatically approved, the MCCA(MACOMB COUNTY CHIROPRACTIC ASSOCIATION) should also be automatically approved for their annual C.E. seminar.

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Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. The state board's role is to protect the public, not to protect the M.A.C. Fairness should prevail. Thank you very much.

Best Regards,

Dr. Mark Cohen, DC  
Utica Chiropractic Clinic  
45200 Sterritt St. Suite 102  
Utica, MI 48317  
586-739-6080  
Fax: 586-739-2797  
[theuticachiro@gmail.com](mailto:theuticachiro@gmail.com)  
[www.uticachiropracticclinic.com](http://www.uticachiropracticclinic.com)

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**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Continuing Education  
**Date:** Monday, January 18, 2021 2:39:47 PM

---

**From:** Peter Costantino <pcostantinodc@hotmail.com>  
**Sent:** Sunday, January 17, 2021 5:26 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic Continuing Education

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Peter Costantino D.C.  
29856 Schoenherr Rd, Ste 2  
Warren, MI 48088  
586-443-5000  
[pcostantinodc@hotmail.com](mailto:pcostantinodc@hotmail.com)

Sent from [Mail](#) for Windows 10

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Michigan Continuing Education  
**Date:** Friday, January 8, 2021 7:07:39 AM

---

**From:** Kelly Cromarty <kscromarty@yahoo.com>  
**Sent:** Thursday, January 7, 2021 8:05 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Michigan Continuing Education

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to

better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Name :Kelly S Cromarty, D.C. Email: [kscromarty@yahoo.com](mailto:kscromarty@yahoo.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Michigan CE Credits  
**Date:** Friday, January 8, 2021 9:59:26 AM

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**From:** Thomas Czarnecki <drtom80@yahoo.com>  
**Sent:** Friday, January 8, 2021 9:37 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Michigan CE Credits

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to

better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

THOMAS CZARNECKI, D.C.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Michigan Board of Chiropractic regarding the proposed rule change  
**Date:** Monday, January 18, 2021 2:42:10 PM

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**From:** Jim Darrach DC <jbackdoc@gmail.com>  
**Sent:** Monday, January 18, 2021 8:55 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Michigan Board of Chiropractic regarding the proposed rule change

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To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and view other C.E. providers as competitors. There would be no 'checks and balances' over the authority being offered to the M.A.C.

I am a long-time member of the M.A.C. and have presented C.E. seminars for the M.A.C, Omni seminars and for the past five years for Fetterman Events. I can tell you with certainty that there is an adversarial relationship between the M.A.C and the other C.E. companies and this has originated and been perpetuated by the M.A.C. A colleague and past president of the M.A.C. called me with warnings and veiled threats regarding my involvement with Fetterman Events. I've seen this same officer of the M.A.C posting on chiropractic pages on social media very disparaging remarks about Fetterman Events and other C.E organizations while promoting the C.E. programs sponsored by the M.A.C and state associations.

The chiropractic board of Examiners already has an overwhelming connection and involvement with the M.A.C. as the chiropractor members of the board are all members of the organization and some are past officers. At least in the current situation this is in part balanced out by the public members of the board. If the M.A.C becomes the only entity approving C.E. seminars, this will most likely eliminate all competing seminars. It might be worth noting that the M.A.C seminars are among the costliest of the various programs offered in Michigan.

All presentations and seminars from Fetterman Events are approved by both a chiropractic college and P.A.C.E. Also, the Fetterman presentations do not include any practice building, entrepreneurial or sales presentations. The M.A.C. can't make this claim.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

--

Dr. James B. Darrach DC RRT FIAMA AAPM  
President/CEO

Trenton Chiropractic & Rehab Inc.  
643 Trenton Ave  
Findlay, OH 45840

Office 419-427-6300  
Fax 419-427-2588

Findlay Integrative Spine Team (F.I.S.T.) Founding Member  
Member Hancock County Opiate Task Force  
Member, Addiction Mental Health Services Board, Hancock County  
President, Findlay Hancock County Library Board of Trustees

Findlay's only Chiropractor on call at Blanchard Valley Hospital Emergency Room.

Past Adjunct Faculty, Brown Mackie College, Findlay OH

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**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Continuing Education  
**Date:** Tuesday, January 5, 2021 3:39:43 PM

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Hi Weston,

Please see below.

-Kimmy

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**From:** Robert Ducharme <ducharmechiro@sbcglobal.net>  
**Sent:** Tuesday, January 5, 2021 3:38 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic Continuing Education

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Dear Members of the Board of Chiropractic,

It has come to my attention that before you on January 19th is a motion to grant the MAC sole authority to approve CCE credits. While this may seem like a great idea for expediency I do believe you are creating a monopoly that will benefit only the MAC. That monopoly will limit access and content of educational material. I do believe it is your responsibility to create requirements that would be appropriate to meet standards set forth by you for these Credits (which you have already done). It is NOT your responsibility to limit who can offer these CCE credits, just the same as you do NOT have the ability to limit the number of Chiropractors who are allowed to practice in this State. It your responsibility to protect the citizens of this State.

I firmly believe you are over stepping your legal limits in accepting this motion and are doing a great disservice to the Profession and the citizens of this State. Fairly applied criteria for the presenters of these credits is your responsibility, not the control of commerce and who presents them. It would be my hope that this proposal be presented to the DOJ's office for legal opinion before moving forward with any hearing in it's regard. Fair and honest trade is good for all!

For the Health and Well Being of All,

Dr. Robert Ducharme (2301002957)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Opposing giving the Michigan Association of Chiropractors (MAC) sole authority over Continuing Education  
**Date:** Friday, January 8, 2021 7:03:18 AM

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**From:** Barbara Dumbrigue <[bdumbrigue@yahoo.com](mailto:bdumbrigue@yahoo.com)>  
**Sent:** Thursday, January 7, 2021 5:15 PM  
**To:** BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
**Subject:** Opposing giving the Michigan Association of Chiropractors (MAC) sole authority over Continuing Education

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Dear Policy Analyst of the State of Michigan and the Board of Chiropractic,

The reason I am writing is to oppose the rule under consideration which would give the Michigan Association of Chiropractors (MAC) sole authority over Continuing Education (CE). Please maintain the distinction between a membership-based professional trade association, MAC, and a governmental regulatory body. There is a potential conflict of interest - the MAC offers CE courses and may try to eliminate other CE providers they might see as competitors. There are no 'checks and balances' over the authority being offered to the MAC.

The Board could consider other more fair and reasonable options - for example, the majority of state Boards in this country utilize PACE (Providers of Approved Continuing Education) of the FCLB (Federation of Chiropractic Licensing Boards). PACE offers a rigorous established review process for CE providers.

MAC should not just be granted automatic CE approval. All CE providers (including MAC) should apply and be reviewed by the state Board or by PACE. There must be independent oversight. If the MAC is automatically approved, other providers (e.g., Macomb County Chiropractic Association and independent providers) should then also be automatically approved for their CE seminars. As well as chiropractic college CE courses – especially since, during this pandemic, they served an important function of offering not only on-campus but off-campus CE courses so Michigan chiropractors didn't have the added risk of travel. Educational diversity is vital, let's not take that away in place of only allowing the MAC courses.

Please re-think this and open up the options to Michigan chiropractors so they can better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. The state Board's role is to protect the public, not to protect the MAC. Allow fairness to prevail. Thank you very much.

Sincerely,  
Barbara Dumbrigue  
[bdumbrigue@yahoo.com](mailto:bdumbrigue@yahoo.com)



**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Continuing Education  
**Date:** Tuesday, January 19, 2021 7:05:40 AM

---

**From:** Stephanie Easton <airportchiro1@ameritech.net>  
**Sent:** Monday, January 18, 2021 9:22 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Continuing Education

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Email to: [BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course

should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Name: Dr. William C Easton D.C.

email address: [airportchiro1@ameritech.net](mailto:airportchiro1@ameritech.net)

**Protect Fairness!**

**Thank you!**

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You are receiving this email because you opted in via our website.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Continuing Education Course Approvals  
**Date:** Wednesday, January 13, 2021 4:20:53 PM

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-----Original Message-----

From: David Estefan <dcacrbi@gmail.com>  
Sent: Wednesday, January 13, 2021 4:20 PM  
To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
Subject: Chiropractic Continuing Education Course Approvals

CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)

To Whom It May Concern,

I am writing to express significant concern over the changes being proposed that would allow the Michigan Association of Chiropractors (M.A.C) to become the regulatory body to approve future continuing education courses for chiropractic physicians in the state of Michigan.

I am dismayed to read that the State Board of Chiropractors in Michigan have already approved this proposed change. This proposal has not been widely made known to the largest group of stakeholders in this issue, the chiropractors of the State of Michigan.

Of greatest concern, if allowed, the M.A.C would be incentivized to only approve courses sponsored by the organization. Additionally, course approval would potentially become steered by a small group who may filter courses for approval based on their own specific lens of what they as individuals feel are related to the chiropractic profession.

I further find it concerning that the chiropractors currently sitting on the State Board of Chiropractors are also all members of the M.A.C. This, in my opinion, creates another conflict of interest.

By allowing this decision to go through, I believe that the breadth and scope of continuing education courses will be diminished. I question the wisdom of not utilizing a larger organization such as PACE (Providers of Approved Continuing Education) for course approval. This organization is being utilized by many other state boards successfully and oftentimes for the same reasons I have explained.

I hope you will please consider my sincere concerns with this proposed change. It would have been my hope to attend the meeting on Tuesday, the 19th of January; but I am currently scheduled to see patients at that time.

Respectfully,

David Estefan D.C.  
Lakeshore Chiropractic  
1838 Baldwin St.  
Jenison, MI 49428

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Continuing Education for Chiropractors  
**Date:** Monday, January 18, 2021 2:31:40 PM

---

**From:** staceyfrancisdc@aol.com <staceyfrancisdc@aol.com>  
**Sent:** Friday, January 15, 2021 11:04 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Continuing Education for Chiropractors

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to

better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Stacey Francis, D.C.

[www.SpecificWellness.com](http://www.SpecificWellness.com)

[Allowing your body to be brilliant!](#)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: To the Policy Analyst of the State of Michigan and the Board of Chiropractic:  
**Date:** Monday, January 18, 2021 2:50:11 PM

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**From:** Michael Gasiewicz <gasiewiczdc@gmail.com>  
**Sent:** Monday, January 18, 2021 12:36 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

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M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to

better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Dr. Michael J. Gasiewicz, DC

[gasiewiczdc@gmail.com](mailto:gasiewiczdc@gmail.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Concerning the Michigan Association of Chiropractors to be the sole governing body for CE credits  
**Date:** Wednesday, January 13, 2021 10:44:06 AM

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**From:** Gerouchiro <gerouchiro@aol.com>  
**Sent:** Wednesday, January 13, 2021 10:14 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Concerning the Michigan Association of Chiropractors to be the sole governing body for CE credits

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Hello,

It has come to my attention that there are possible changes coming regarding continuing education credits in the State of Michigan for Chiropractors. I am a member of the Michigan Association of Chiropractors, which is a fine organization. I am also a member of "Fetterman Seminars", another fine organization offering excellent seminars at affordable prices for us Doctors. I don't want any conflict of interest in having only one body being able to accept or reject seminars offered. Please keep that in mind when making decisions regarding this topic. I do like that the major chiropractic organization has a strong hand in continuing education requirements and credits, as we all want our profession to strive to stay on top of the latest content that applies to us.

Thank you for your time.

Sincerely,

Thomas J. Gerou, DC

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: State Proposal for Continued Education  
**Date:** Monday, January 11, 2021 7:08:50 AM

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**From:** Rita Goines <[rgoines@yahoo.com](mailto:rgoines@yahoo.com)>  
**Sent:** Saturday, January 9, 2021 9:01 AM  
**To:** BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
**Subject:** RE: State Proposal for Continued Education

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no "checks and balances" over the authority being offered to the M.A.C..

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should not be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E.. There must be independent oversight.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-Campus OR Off-Campus. The pandemic has shown us that education diversity is valid and useful. There is no reason that an identical course should only be approved On-Campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C..

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest.

**The state Board's role is to protect the public, not to protect the M.A.C.. Fairness should prevail.**

Thank you for your time.

Sincerely,

Rita Goines-McClain, D.C.  
Email Address: [rgoines@yahoo.com](mailto:rgoines@yahoo.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Jan. 19, 2021 Public Hearing on Chiropractic rule set 2019-84 LR  
**Date:** Monday, January 18, 2021 2:40:52 PM

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-----Original Message-----

From: Denise Goodwin Alter <[denise@divorcewithoutdrama.com](mailto:denise@divorcewithoutdrama.com)>  
Sent: Sunday, January 17, 2021 11:30 PM  
To: BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
Subject: Jan. 19, 2021 Public Hearing on Chiropractic rule set 2019-84 LR

CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)

I am writing to voice my opposition to the proposed modifications.

As a consumer, I think continuing education is important. It provides my healthcare professional with programs that enable him/her to rectify any skill deficiencies and keep up with advances in the field.

However, that is only true when the educational programs themselves are of a high quality.

Currently, the Board is responsible for reviewing educational programs. As I understand it, the proposed change would transfer that responsibility to what is essentially a trade association that produces some of these programs itself. One has to wonder how this makes any sense at all. More importantly, one has to wonder how this is going to impact the quality of care I receive?

I do not believe that the trade association can be expected to fairly evaluate other organizations' offerings. It is a complete conflict of interest for them. I think it is reasonable to expect that there will be fewer courses for my doctors to choose from. That will be either because the groups that put on these programs tire of being rejected and just stop submitting them, or they stop because submission fees set by the reviewer - their competition - have become oppressive.

Either way my healthcare professional is going to have considerably less educational opportunities to choose from, which means the quality of care that he/she is able to provide, i.e., the quality of care I receive, will be reduced accordingly. Not good!

Aside from my concern for myself, I would think that the chiropractors themselves would be concerned that it was not all that long ago that chiropractic care was not even recognized as being part of the "medical" world. It has come a long way but relaxing your standards at this point - and that is exactly how this will appear to the general public - is likely to set you back.

I think it behooves the general public as well as the profession for the review of educational programs to remain with the governmental body that has no horse in the race and exists for the sole purpose of protecting the public. I hope this is helpful and submit it respectfully.

Denise Goodwin  
Sent from my iPhone

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: MAC proposal  
**Date:** Tuesday, January 12, 2021 8:36:27 AM

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**From:** Timothy Grondin <docgrondin@gmail.com>  
**Sent:** Tuesday, January 12, 2021 8:32 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** MAC proposal

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

Under no circumstance should the M.A.C. be given the broad based authority to determine how C.E. credits should be achieved and who should be providing those C.E. credits. Freedom of choice in health care has been a rallying cry of the chiropractic profession for years as we fight to maintain our position in the healthcare industry and it should be no different when it comes to providing our practitioners with quality education from a number of resources and professional organizations from around the state.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations. This should be the standard by which the State of Michigan determines which C.E. providers can offer approved course work.

The state board's role is to protect the needs of the public and not the special interests of the M.A.C. Freedom of choice must prevail.

Sincerely,

Dr. Timothy Grondin

[docgrondin@gmail.com](mailto:docgrondin@gmail.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: State of Michigan Chiropractic Continuing Education  
**Date:** Monday, January 18, 2021 8:42:45 PM

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Please see below.

-Kimmy

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**From:** SBC Global <jqhdc@sbcglobal.net>  
**Sent:** Monday, January 18, 2021 3:20 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** State of Michigan Chiropractic Continuing Education

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C. There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations. Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Lastly, much less than 50% of chiropractors are members of the Michigan Association of Chiropractors, which is about on par with most healthcare professional associations, so why should an association have control of continuing education when they would be possibly targeting their members needs vs. non-member needs? On the other hand, 100% of chiropractors deal with P.A.C.E. and the licensing board and it should be these

independent agencies that approve the qualified C.E. courses. **M.A.C. is a for profit organization** and if left to its own devices, there is no preventing them from requiring chiropractors to only take their C.E. courses. Presently we have the opportunity to take C.E. credits from accredited schools around the country and each school is unique in their own presentation of chiropractic knowledge.

Sincerely,

Joel Q. Hack, D.C.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Proposal giving M.A.C. the authorization and the approval process over all continuing ed programs and credits  
**Date:** Tuesday, January 12, 2021 7:03:28 AM  
**Attachments:** [Board of Chiropractic Examiners.docx](#)

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**From:** Daniel Halaberda <dhalaberda@yahoo.com>  
**Sent:** Monday, January 11, 2021 7:59 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Proposal giving M.A.C. the authorization and the approval process over all continuing ed programs and credits

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

I am harshly opposed to this proposal. My letter is attached.

Lets KEEP Continuing Ed programs on a level playing field.

Daniel Halaberda, D.C.  
Co-owner of OMNI Chiropractic Seminars  
34044 Harroun Street  
Wayne, MI 48184

To the Policy Analyst of the State of Michigan and Michigan Board of Chiropractic Examiners:

My name is Daniel Halaberda, D.C. and I am a licensed and practicing Chiropractor in Michigan and have been for 41 years. I am a graduate of Sherman College of Chiropractic. I am writing to you concerning the rule(s) being considered which would make the Michigan Chiropractic Association (MAC) the exclusive authority over the Chiropractic educational credits for Chiropractors licensed to practice in the State of Michigan.

Chiropractic and Politics have been around since the early years of the profession. The conservative and liberal practices have attempted to control the profession **FOREVER!** The parent organizations of the MAC - the Michigan Chiropractic Council (MCC) and the Michigan State Chiropractic Association (MSCA) have FOR many years attempted to control the Chiropractic profession. In early 1980, the Michigan Board of Chiropractic Examiners (MBCE), comprised of MCC and MSCA members were in the majority on the Board and attempted to restrict graduates from Sherman College from sitting for licensing. The joint legislative administrative rules committee did NOT allow such a bad political restriction to occur.

I am an owner of Omni Chiropractic Seminars, which has been providing Continuing Educational (CE) credits for Chiropractors since 1989 (32 years), and I am a direct competitor of the MAC. In that time, I have never discouraged anyone who wished to belong or attend any other CE program that they choose to attend. That has not been the case with the MAC. It has been the unwritten policy of this group to prevent any and all vendors at their programs from doing business or providing services to non-members. In 1998, the Michigan Board attempted to pass a resolution, which would have allowed only state associations or Chiropractic colleges to provide CE credits. Again, the joint legislative rules committee did not permit such a monopolistic restriction to be allowed, much to the wasting of taxpayer money.

The current attempts by the MBCE to restrict the competition of the CE market to only the MAC, which is a membership based CE competitor, is NOT ONLY WRONG, but a CONFLICT OF INTEREST and the implications border on anti-trust or criminal fraud. Since CE credits are required to renew a license; the State must and should maintain a neutral and objective review of ALL programs. To make the MAC in charge of any and all programs is like making the fast food company, McDonald's, in charge of the rules in which all fast food restaurants are allowed to operate! The MAC does not even represent the majority of Chiropractors in Michigan.

Also to my knowledge, NO state has a restriction on CE programs being presented on-site at any Chiropractic colleges. This kind of political manipulation **MUST and SHOULD NOT** be allowed in any form. It would diminish the quality of Chiropractic continuing education.

In closing, ANY restriction of competition in the CE market will destroy many quality programs presently servicing the needs of Michigan Chiropractors. Making a political organization such as the MAC the authority for all CE programs is a dangerous choice and I harshly oppose to this proposal.

Keep CE programs on a level playing field.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Oppose M.A.C. having sole authority over Continuing Education  
**Date:** Monday, January 11, 2021 1:12:57 PM

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**From:** hallettchiro@hallettchiro.com <hallettchiro@hallettchiro.com>  
**Sent:** Monday, January 11, 2021 1:12 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Oppose M.A.C. having sole authority over Continuing Education

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The State Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Robert B Hallett, DC

[hallettchiro@HallettChiro.com](mailto:hallettchiro@HallettChiro.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Continuing Education and the Michigan Association of Chiropractors  
**Date:** Tuesday, January 12, 2021 7:02:32 AM

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**From:** Royann Hassinger <drroyann@gmail.com>  
**Sent:** Monday, January 11, 2021 5:15 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic Continuing Education and the Michigan Association of Chiropractors

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C. (I have been a member of the M.A.C, active in the organization at its inception and have benefited much from them). Have we learned nothing this last year on the need of 'checks and balances'?

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, then other groups should also be automatically approved for their annual C.E. seminar. (*I attend one close to my home that has been excellent and convenient. I choose not to travel far regardless of a pandemic.*)

Chiropractic College C.E. courses should be automatically approved whether classes

are offered On-campus ***OR*** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Royann M. Hassinger, D.C.

[drroyann@gmail.com](mailto:drroyann@gmail.com)

Ortonville Chiropractic

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW:  
**Date:** Wednesday, January 6, 2021 7:03:39 AM

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**From:** sharon havis <drhavis@gmail.com>  
**Sent:** Tuesday, January 5, 2021 7:53 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>; Martin Brown <blestday@yahoo.com>  
**Subject:**

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Name: Sharon Lee Havis, DC

Email [Address:drhavis@gmail.com](mailto:drhavis@gmail.com)



**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: To the Policy Analyst of the State of Michigan and the Board of Chiropractic  
**Date:** Monday, January 18, 2021 2:31:49 PM

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**From:** K H <chirohitman@yahoo.com>  
**Sent:** Saturday, January 16, 2021 12:22 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** To the Policy Analyst of the State of Michigan and the Board of Chiropractic

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

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There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to

better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The State Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Kirk Hilborn D.C.

[chirohitman@yahoo.com](mailto:chirohitman@yahoo.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: New Chiropractic Policy  
**Date:** Wednesday, January 6, 2021 7:03:25 AM

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**From:** Chelsea <chelseajaques@yahoo.com>  
**Sent:** Tuesday, January 5, 2021 7:14 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** New Chiropractic Policy

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

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M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

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Sincerely,

Chelsea Jaques, DC  
[chelseajaques@yahoo.com](mailto:chelseajaques@yahoo.com)  
770-900-2020

Sent from my iPhone

Sent from my iPhone

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Opposing Board of Chiropractic CE Changes  
**Date:** Monday, January 18, 2021 2:31:19 PM

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-----Original Message-----

From: Dr. Alex <[dralex@clairpointe.com](mailto:dralex@clairpointe.com)>  
Sent: Friday, January 15, 2021 9:12 PM  
To: BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
Subject: Opposing Board of Chiropractic CE Changes

CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)

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M.A.C. should not be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus OR Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail. Thank you very much.

Sincerely,  
Alexander Jeffrey D. C.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Continuing Education Policy  
**Date:** Wednesday, January 6, 2021 7:28:44 AM

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**From:** Karl R.O.S. Johnson, DC <karl.cnwc@gmail.com>  
**Sent:** Wednesday, January 6, 2021 7:28 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Continuing Education Policy

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

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Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without

a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Blessings for Vibrant Health and Prosperity,

Dr. Karl R.O.S. Johnson  
DC, BCN, DNMS, FICPA, FIFHI, RTP®

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**For HIPAA compliance, please send lab work and other Protected Health Information (PHI) through our secure portal at <https://JCNN.leapfile.com>. You can also communicate via the patient portal by typing the same thing you would type in an email into a text document and then upload the text document to <https://JCNN.leapfile.com> to maintain privacy for your confidential information.**

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Johnson Chiropractic Neurology & Nutrition

Michigan Brain Health

Johnson Health & Wellness Center

51735 Van Dyke Avenue, Shelby Township, MI 48316

(586) 731-8840



Websites:

<http://www.HelpMyChronicPain.com>

<http://www.MichiganBrainHealth.com>

<http://www.JohnsonHealthandWellness.com>

Blog:

<http://www.DrKarlJohnson.com>

Facebook:

<https://www.facebook.com/ShelbyChronicConditionDoctor>

Twitter:

<https://www.twitter.com/WellnessChiroMI>

LinkedIn:

<http://www.linkedin.com/pub/dr-karl-r-o-s-johnson-dc/26/676/422>

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**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Ce credits  
**Date:** Monday, January 18, 2021 3:16:19 PM

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**From:** michiro9@aol.com <michiro9@aol.com>  
**Sent:** Monday, January 18, 2021 3:15 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic Ce credits

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Hello,

My Name is Dr. Richard Johnson D.C., I have been a chiropractor in Michigan for over 30 years. I'm a member of the Michigan Association of Chiropractors and have been a past member of the other professional organizations in Michigan.

I am against giving the M.A.C. oversight of the Continuing Education course approval process. I believe this is a total conflict of interest. That being said I do attend many of the M.A.C. continuing education classes but find they do not offer all the curriculum that I would be interested in learning. I feel that putting a trade association in charge of approval of CE classes is wrong

Richard B Johnson D.C.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Continuing Education  
**Date:** Monday, January 18, 2021 8:43:25 PM

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Please see below.

-Kimmy

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**From:** Larry Kaplan <larry.kaplan.chiropractor@gmail.com>  
**Sent:** Monday, January 18, 2021 4:40 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic Continuing Education

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

I am writing to you today because I am opposed to the rule now under consideration to allow The Michigan Association of Chiropractor (MAC) the sole authority over the continuing education program. The MAC is a membership association and not a governmental authority as it is written in its bylaws. and concerning a conflict of intby have been in practice in Michigan since 1985 and have attended many continuing education seminars approved by the state Chiropractic Board. This very issue was brought many years ago and was voted down by the majority. I believe the new rule if approved would form a monopoly with the continuing education process in the State of Michigan. Again the MAC is a members only association not everyone is a member.and in their bylaws it states that they are not a Governmental Body. Please oppose this rule as it would form a monopoly which is also illegal as well. Should you have any questions please feel free to contact me at my office and or telephone number below. Yours in Health Dr Larry G Kaplan

Larry G. Kaplan  
Kaplan Chiropractic Clinic  
410 N.Lafayette  
South Lyon, MI 48178  
[www.Kaplanchiropracticclinic.com](http://www.Kaplanchiropracticclinic.com)  
248 437 3500

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: For Public Hearing on Chiropractic Rules  
**Date:** Tuesday, January 5, 2021 1:31:45 PM

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**From:** rjkofnovi <rjkofnovi@aol.com>  
**Sent:** Tuesday, January 5, 2021 1:25 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** For Public Hearing on Chiropractic Rules

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

**To:** [BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

This is submitted to be presented at the Public Hearing of the State of Michigan regarding the Chiropractic Rules. I am a Chiropractic patient and I learned of the Michigan Board of Chiropractic's proposed new rules. I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. **There must be independent oversight.** The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that

should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. **All** C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar. There must be independent oversight over all providers of Continuing Education.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no valid reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail. **No entity should be "above the rules."** No other Board or organization would permit this inappropriate action.

Thank you very much.

Sincerely,

Robert Korn

41514 Cornell Dr

Novi, MI 48377

[rjkofnovi@aol.com](mailto:rjkofnovi@aol.com)

[Sent from the all new Aol app for iOS](#)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Continuing Education  
**Date:** Monday, January 11, 2021 1:30:05 PM

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Please see below.

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**From:** Charmaine Lanjopoulos <[lanjorc@yahoo.com](mailto:lanjorc@yahoo.com)>  
**Sent:** Friday, January 8, 2021 3:32 PM  
**To:** BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
**Subject:** Chiropractic Continuing Education

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic

I am writing to express my opposition to the rule that is under consideration that would allow the Michigan Association of Chiropractors also known as M.A.C. sole discrimination and authority regarding Continuing Education in the state of Michigan.

As a practitioner who is interested in a wide range of techniques and courses that are widely available through various Associations, I find that the effort to control what is presented here in Michigan by limiting "competition" somewhat abhorrent.

The majority of states use the Providers of Approved Continuing Education (P.A.C.E) which is part of the Federation of Chiropractic Licensing Boards and which upholds rigorous review process for all Continuing Education.

There needs to be an independent review of courses that are offered to allow for the best quality and the best variety to meet the needs of all the individual chiropractors in the state. By limiting Continuing Education Credit approval to the M.A.C. and thereby to their associates, conflicts of interest will arise as members of the M.A.C. may be the very people making financial gain from courses that only they have an interest in presenting.

In light of the current Covid pandemic, it has also become apparent that more classes can be effectively taught online and most likely reach more practitioners who will not need to close their practices to attend Continuing Education that the M.A.C. may present during office hours. It will also allow us to cut costs and reduce the risks that are currently associated with traveling in the time of Covid and for which a timeline has yet to be evident that would allow us to return to a more normal way of life.

The Idea of one group of people imposing their particular stream of thought and technique in direct conflict with the goal of making us more well-rounded and better-qualified profession by having a greater choice of Continuing Education choices, is a conflict of interest with stated goals of the M.A.C.

Thank you

Charmaine Lanjopoulos DC RYT Grand Ledge Michigan [lanjorc@yahoo.com](mailto:lanjorc@yahoo.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Opposed to M.A.C.to have sole C E authority !  
**Date:** Monday, January 18, 2021 2:47:25 PM

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**From:** Ray Lanjo <raylanjo@yahoo.com>  
**Sent:** Monday, January 18, 2021 11:07 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Opposed to M.A.C.to have sole C E authority !

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why is M.A.C. 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail. Thank you very much.

Sincerely, Raymond L Lanjopoulos D C

Name: \_\_\_\_\_ Email Address:  
[raylanjo@yahoo.com](mailto:raylanjo@yahoo.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Public Hearing on Chiropractic Rules , January 19 ,2021  
**Date:** Monday, January 18, 2021 2:39:28 PM

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**From:** Kenneth Large <drkenlarge@yahoo.com>  
**Sent:** Sunday, January 17, 2021 3:23 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Public Hearing on Chiropractic Rules , January 19 ,2021

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To: [BPL-BoardSupport@Mich.gov](mailto:BPL-BoardSupport@Mich.gov)

Re: Public Hearing on Chiropractic of January 19, 2021

To the Policy Analyst and the Chiropractic Board members:

I am writing to voice my opposition to the proposed rule change that would give authority to review and approve Chiropractic continuing education credit to the Michigan Association of Chiropractors (MAC) instead of Board of Chiropractic direct review of continuing education programs.

As a Chiropractor licensed and practicing in Michigan for over 50 years I have taken well over a thousand hours of

continuing education credits. It would be appropriate for any seminars sponsored by the Chiropractic colleges, the nutritional suppliers, as well as the Macomb County Chiropractic Association be automatically approved if MAC courses are automatically approved.

To place all of the power of approval decisions in the hands of MAC involves the potential danger of conflict of interest since the MAC holds seminars and MAC benefits financially from course fees as well as booth rentals at their events. The MAC could monopolize continuing education with the power to approve or deny credit to other sponsoring groups which would negatively impact the profession in Michigan. I oppose MAC being given review and approval authority and would like to see the state Board itself or a neutral national entity handle the review process fairly.

Please give careful consideration to my insights. Thank you.

Sincerely yours,  
Kenneth B. Large D.C.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Fairness  
**Date:** Monday, January 18, 2021 2:40:12 PM

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**From:** Richard Larned <drlarned@live.com>  
**Sent:** Sunday, January 17, 2021 7:01 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Fairness

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to

better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely, Richard W. Larned, M.S., D.C.  
[drlarned@live.com](mailto:drlarned@live.com)



Virus-free. [www.avast.com](http://www.avast.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Continuing Ed  
**Date:** Tuesday, January 12, 2021 7:03:35 AM

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**From:** Natalie Lawrin <lawrinna15@gmail.com>  
**Sent:** Monday, January 11, 2021 8:45 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Continuing Ed

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

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Please re-think the process and open up the options to Michigan Chiropractors to

better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Natalie Lawrin, D.C.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Continuing Education Conflict  
**Date:** Thursday, January 14, 2021 3:31:22 PM

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**From:** Larry Lee <larryleenaco@gmail.com>  
**Sent:** Thursday, January 14, 2021 6:55 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Continuing Education Conflict

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Please don't let the trade association M.A.C. gain control of the continuing education courses. M.A.C. makes money from holding their own courses. They would be in a position to limit access to instructors, be a monopoly and force other continuing education organizations out.

The result would be that we would have to pay a lot more for our continuing education. As it is now there are courses close to where I live. I don't have to travel for hours and spend two nights at a hotel.

Please keep the continuing education as it is with the Michigan Board of Chiropractic or P.A.C.E. approving the courses.

Very best wishes - Lawrence E. Lee, D.C.

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**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Continuing Education  
**Date:** Friday, January 8, 2021 9:18:32 AM

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**From:** G LOISELLE <[chiro-care@msn.com](mailto:chiro-care@msn.com)>  
**Sent:** Friday, January 8, 2021 8:51 AM  
**To:** BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
**Subject:** Chiropractic Continuing Education

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

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Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Gary A Loiselle, D.C.

Email Address: [chiro-care@msn.com](mailto:chiro-care@msn.com)

Sent from [Mail](#) for Windows 10

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: For the Public Hearing on Chiropractic Rules January 19, 2021  
**Date:** Monday, January 18, 2021 2:40:57 PM  
**Attachments:** [MCCA letter to Public Hearing 1-19-2021.pdf](#)

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**From:** Martin Brown <blestday@yahoo.com>  
**Sent:** Sunday, January 17, 2021 10:54 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** For the Public Hearing on Chiropractic Rules January 19, 2021

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

The attached letter in PDF format is provided for the Public Hearing on proposed Chiropractic Rules of Jan. 19th.

Please share the attached letter with the Public Policy Analyst and the Board of Chiropractic.

**Thank you very much!**

*M.B.*

# Macomb County Chiropractic Association



13335 15 Mile Road  
Sterling Heights, MI 48312  
(586) 795-3366

[www.macombcountychiropracticassociation.org](http://www.macombcountychiropracticassociation.org)

Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing  
Boards and Committees Section  
P.O. Box 30670  
Lansing, MI 48909-8170  
Attention: Policy Analyst and Board of Chiropractors

Sent via email on January 16, 2021 to: [BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)

**RE:** Comments for the Jan. 19, 2021 Public Hearing on Chiropractic rule set 2019-84 LR from the Macomb County Chiropractic Association

To Whom It May Concern:

This correspondence is submitted on behalf of the Macomb County Chiropractic Association (M.C.C.A.) expressing our concerns about the proposed changes to the Michigan Board of Chiropractic's (B.O.C.) Administrative Rules (R 338.12001 to R 338.12054), specifically rule R 338.12041, governing continuing education. Our Association sees the need for **fair updates** to advance the process of Continuing Education (C.E.) review while continuing the Board's primary obligation of protecting the health and welfare of Michigan's citizens. The current onerous C.E. review process can be greatly reduced or eliminated in an honest and equitable manner that is fair to all, including the BOC, as well as the various entities providing C.E. An analysis and alternative options are provided in this report.

## **Information about the M.C.C.A.**

The Macomb County Chiropractic Association (M.C.C.A.) is a non-profit organization established in the 1970s to promote the Chiropractic profession and to support the Chiropractors. In 1971 a group of local D.C.'s seeking Chiropractic camaraderie, networking, continuing education, and health promotion throughout the county gathered and formed this fine organization. The M.C.C.A. is among the oldest and longest serving independent Chiropractic organizations in the state of Michigan.

The Macomb County Chiropractic Association has no paid staff and is run on a voluntary basis. The organization has no physical building, thus no significant overhead. Annual dues are just \$50 per doctor per year.

Annual continuing educational courses have been offered by the Macomb County Chiropractic Association for nearly 50 years as part of the mission of the organization.

The Macomb County Chiropractic Association has an established Permanent Endowment Fund to benefit autistic and emotionally impaired children via the Macomb Intermediate School

District. The fund's earnings benefit special needs children in perpetuity. The Macomb County Chiropractic Association also disburses thousands of dollars in scholarships to Chiropractic students annually. Scholarship applications are available by February and are due back mid-March. Winners are announced by June of each year.

The Macomb County Chiropractic Association is non-political and is independent of any other state or national chiropractic organization. The M.C.C.A. encourages concurrent membership in the Michigan Association of Chiropractors.

### **R 338.12041 Proposed C.E. Rule Change Synopsis**

The proposed new rule would require C.E. be approved by the Michigan Association of Chiropractors (M.A.C.) except courses related to Chiropractic practice are offered on-campus by an approved Chiropractic College; initial presentation of a C.E. program related to a state, regional, national or international organization.

The new rule would rescind C.E. sponsors from applying for approval from the B.O.C. directly and these rules do not address any B.O.C. appeal process or recourse for any potential review errors which may be made by the M.A.C. as the proposed primary reviewer of C.E. programs.

### **Current C.E. Rule Synopsis**

As of the B.O.C. meeting of January 29, 2020 the Board established automatic C.E. approval for up to 5 credits per semester of academic Chiropractic-related courses in an approved Chiropractic College; attending a C.E. program on-campus at an approved Chiropractic College; attending a C.E. program sponsored by the M.A.C. Provider entities aside from the M.A.C., such as the M.C.C.A., can apply for approval of C.E. programs. Initial presentation of C.E. courses with restrictions of 2 hours C.E. credit for each hour of presentation via the American Chiropractic Association (A.C.A.), International Chiropractors Association (I.C.A.) or the M.A.C., or an organization approved by the Board, with a maximum of ten hours in a renewal two-year period.

### **C.E. Application Review Procedure**

The process in place now allows organizations such as the M.C.C.A. to apply directly to the B.O.C. for review and approval of a C.E. program. The documentation is extensive and thorough as expected. The B.O.C. committee dealing with C.E. reviews the applications and makes recommendations to the Board which are formally voted on at the next quarterly meeting. The M.C.C.A. hosts just one weekend seminar per year. (*Online programming, for the very first time for the M.C.C.A. in 2020, has been added by necessity due to Covid gathering restrictions.*)

### **Why C.E. procedure change is needed**

The quantity of C.E. applications has increased, primarily due to the growth of online course options. The Board members reading the applications stated that they are overwhelmed by the

volume of applications. 2020 saw the highest number of applications over prior years. The Board desires to reduce the time-consuming C.E. review burden.

The Board's website lists the approved courses year by year and counting each year's applications reviewed does verify the increased number in 2020. Typically, there have been approximately 100 approved programs per year from 2014-2019. In 2020 302\* programs are listed as approved, the majority being online programs. This onerous workload is time-consuming and it is reasonable for the Board to consider alternatives to reduce the direct work involved. The M.C.C.A. does not oppose the establishment of a new C.E. application review system as long as the system is **fair and equitable to all C.E. providers**.

### **Timing issues**

It is recognized that the Board officially meets only on a quarterly interval throughout the year which slows the C.E. review process. For example, the M.C.C.A. has applied at least 9 months in advance of the sole annual seminar to ensure advance course approval. The Michigan C.E. sponsor application requests submission at least 60 days prior to the program date. Any new system utilizing an outside reviewer such as PACE would naturally expedite this process while maintaining a very rigorous and respected impartial review. PACE as a reviewer would avoid the concerns of conflict of interest, retaining neutrality *while streamlining and expediting the review process in a fair, even-handed manner*.

### **Analysis of 2020 C.E. approved courses**

A detailed analysis of the 2020 list of approved courses shows that there are just **17** distinct C.E. sponsoring entities approved by the board in 2020. If the Board had only reviewed sponsors with **5** or fewer applications in 2020 the Board would have reviewed just **21** applications, significantly fewer than typically reviewed over the past six years.

In fact, 7 of the 2020 sponsors only provided one (1) single application during the entire year. One sponsor submitted just 2 applications and the M.C.C.A. would have only submitted only 1 if the Covid crisis had not impacted the sole annual seminar, yielding additions for online courses. M.C.C.A. only hosts 1 seminar per year.

*Here is the breakdown of the 2020 approved programs: (Highlighted have 5 or fewer courses)*

'DC Hours' - 122

**Birmingham Chiro. Assoc. - 1**

N.Y.C.C. - 23

**Omni - 4**

**Univ/Western States - 4**

Wisconsin Chiro. Assoc. - 1

New Mexico Chiro. Assoc. - 1

Fetterman- 18

Healthquest - 1

Data Trace Publishing - 4

MCCA - 1 seminar +14 online

National Provider Compliance - 1

Palmer College - 82

Seminars in Chiro. Research - 1

Complete Concussion Mgt. - 1

'The Wise D.C.' - 16

Texas College -2

*\*Please note that the final approval number in the official list posted online starts with number 239190101 and ends with #239200402 thus you might assume that there was a grand total of 302 approved courses. Note that # ...290 and #...292 were removed as duplicates and #...393 was missing thus the actual total of approved courses in 2020 was 299.*

### **Comments on data analytics:**

Over two-thirds (2/3) of the approved courses came from just 2 sponsors ('D.C. Hours' and Palmer College.) If the Board permitted Chiropractic Colleges automatic approval for courses on-campus, off-campus or online the Board's workload would have been reduced by about 1/3.

**Online** programs: total count: 259 representing 87% **Online** courses.

**Live** programs: total count: 40 representing 13% **Live** courses.

This detailed data-review demonstrates that if the Board opts to accept the direct applications from C.E. sponsoring entities offering five (5) or fewer programs per year then the Board's **workload would be decreased by well over 90%.**

If the Board allowed sponsors submitting no more than 5 applications per year to apply directly to the Board they would have only reviewed **21** applications in 2020, far fewer than the number in any of the past 6 years. This quantity is very manageable and represents a significant reduction in the Board's workload while promoting fairness in the review process.

### Considerations for fairness in a new C.E. Review System

1. Any new system of C.E. approval adopted by the B.O.C. should be equitable and fair to all C.E. provider entities to retain integrity and even-handedness. *A reviewing entity that does **not** provide C.E. would be naturally impartial.*
2. Conflict of interest and the potential or appearance of impropriety must be avoided.
3. The Board always retains ultimate control over the requirements of continuing education. Even if an outside impartial C.E. review agency such as the nationally accepted P.A.C.E. is selected, the licensees would still abide by the specific Michigan C.E. rules.
4. An option of direct application for C.E. course approval should be retained (even if limited to 5 applications per year) regardless of any other choice of review entity. A Board appeal option for any unfairly denied applicant would inherently be retained by allowing direct application of up to 5 per year.
5. If M.A.C. programs are automatically approved so should M.C.C.A. programs. *(The non-profit M.C.C.A. has proven to be a worthy non-profit organization with an extensive history of high-quality C.E. programs approved for nearly 50 years. M.C.C.A.'s programs have consistently met the State of Michigan requirements. It is noteworthy that M.C.C.A. has a longer history than the merged M.A.C. which was formalized in 2007 and this should be acknowledged by the Board with comparable automatic approval for the one annual M.C.C.A. seminar. Equivalence of rationale over favoritism would be ethical.)*
6. The Board website should continue to list all approved courses regardless of reviewing entity.
7. Initial presentation of C.E. courses should **not** be restricted to A.C.A., I.C.A. or M.A.C. presenters as **ALL presenters of approved programs** put in time and effort to produce their lectures and should be entitled to the 2 hours C.E. credit for each hour of presentation. Language might be updated to: "...initial presentation of a C.E. program related to an approved program." (deleting the restrictive words: state, regional, national or international organization.)
8. Chiropractic College courses should be automatically approved whether given on-campus, off-campus or online. The pandemic crisis has created a seismic shift in education with online programs now offered as an educational alternative in schools and universities in Michigan and nationwide. There is no reason that an identical course should only be automatically approved on-campus, forcing Michigan's Chiropractors to travel at added risk and expense.

### Board always determines the number of C.E. hours and all specific requirements

The B.O.C. has always determined the number of hours required (*30 hours per 2-year re-licensure period*) as well as the specific courses or topics to be included in a D.C.'s completed courses. These include 1 hour in Pain and Symptom Management, 1 hour in Ethics, 1 hour in Sexual Boundaries, 2 hours live in Physical Measures, 2 hours live in the Performance and

Ordering of Tests. Other one-time requirements such as the Human Trafficking topic are part of the health care provider requirements as well.

These parameters are always to be determined by the B.O.C. As always, it is the responsibility of the licensee to be aware of the C.E. requirements as they attest to completion of these hours of course-work when renewing their license every two years. The various organizations such as the M.C.C.A. and the M.A.C. are careful to consistently inform the attendees of their programs about the specific requirements. The D.C.'s are very well aware of the need to meet the specific requirements within the re-licensure period. **Even if an outside impartial C.E. review agency such as the nationally accepted P.A.C.E. (Providers of Approved Continuing Education) the licensees would still abide by the specific Michigan C.E. rules.** All unique aspects of Michigan's C.E. requirements for Chiropractors would be fully preserved if P.A.C.E. does the C.E. application review. Utilizing an independent entity such as P.A.C.E. does **not** in any way interfere with the delivery of quality C.E. in Michigan, in fact **quality would be maintained and approval speed would be greatly enhanced.**

Outsourcing the duties of C.E. review and approval ***while retaining a concurrent limited direct application Board process option*** would dramatically reduce the workload of the current protocol for the Board and the State of Michigan's Board Support staff while retaining fairness, safeguarding C.E. program quality and continuing to meet all necessary standards. The Board could accept up to 5 applications per sponsor per year, with any overage going to P.A.C.E. This is a reasonable and fair compromise solution for serious Board consideration. There is clear precedent for this protocol.

#### **Other Jurisdictions:**

It should be noted that 48 of the 50 state Boards are members of the Federation of Chiropractic Licensing Boards (FCLB). Michigan is not currently a member. All state Boards are welcome to join FCLB and there are many benefits. Just as any Chiropractor is encouraged to join M.A.C., any state licensing board may easily join FCLB.

The essential mission of the FCLB is to protect the public by promoting excellence in chiropractic regulation through service to member boards. PACE (Providers of Approved Continuing Education) is a signature program of the FCLB. The FCLB encourages regulatory boards to employ best practices in public protection and to develop consistency in standards. PACE ensures reliable and scientifically sound quality chiropractic continuing education.

PACE streamlines chiropractic continuing education and reduces onerous paperwork and review processes, provides reliable reports on fulfillment of re-licensing requirements, and helps audit compliance. Before PACE, there was little consistency in chiropractic continuing education approval processes. PACE provides consistency for regulatory boards, providers, chiropractic practitioners, and professional associations. For Regulatory Boards such as the B.O.C., PACE provides economy of scale, informed and professional evaluations, automatic credit reporting, and a simplified CE approval process.

*The following jurisdictions are listed with PACE:*

Alabama	New Hampshire
Alaska	New Jersey
Arizona	New Mexico
Connecticut	North Carolina
District of Columbia	North Dakota
Florida	Ohio
Georgia	Oklahoma
Idaho	Oregon
Indiana	Rhode Island
Iowa	South Carolina
Kansas*	South Dakota
Kentucky	Tennessee
Maine	Texas
Maryland	Utah
Massachusetts	Vermont
Minnesota	Virginia
Montana	Washington
Nebraska	Wyoming
Nevada	Puerto Rico

Kansas\* is a unique aberration as they have a complex C.E. rule set with two “categories” of C.E. Category I (20 hours) includes structured formal lectures, panel discussions and seminars. Category II (30 hours) includes attendance at items not covered in Category I such as clinical consultations with other practitioners, participation in activities to review the quality of patient care, instructing health care practitioners, patient-centered discussions with other health care practitioners, participating in journal clubs, using searchable electronic databases in connection with patient care activities; and using self-instructional materials. Kansas has accepted PACE for years. The Kansas State Board of Healing Arts, their state’s version of the Michigan B.O.C., permits the Kansas Chiropractic Association Continuing Education Committee to review and approve C.E. in Kansas. ***This is not a trend but an aberration*** as the vast majority of states utilize PACE to impartially streamline and simplify the CE approval process.

The Kansas Association charges fees to C.E. sponsor applicants at \$45.00 per approval request or \$500.00 per 12 months of unlimited C.E. approval requests. The Michigan Board has never charged any C.E. sponsor an application fee. The M.A.C. has not provided any written guarantee that they will continue to provide ongoing C.E. application review at no charge as a service to the profession. They may decide to make this a profit-making component if the Board does not act to protect C.E. sponsors, a potential further conflict of interest related matter.

The state of Tennessee's Board of Chiropractic accepts PACE as well as programs approved by their state association, the Tennessee Chiropractic Association. Tennessee wisely provides multiple C.E. options including PACE. *Here are two images from the related Tennessee sites:*

The screenshot shows the Tennessee Department of Health website. At the top, there is a navigation bar with the TN Department of Health logo, a search bar, and a 'Go to TN.gov' link. Below the navigation bar is a red banner with the text 'FIND COVID-19 INFORMATION AND RESOURCES' and a sub-banner 'INFORMATION FROM TN DEPT OF HEALTH ABOUT THE ONGOING NOVEL CORONAVIRUS OUTBREAK'. The main content area is titled 'Board of Chiropractic Examiners' and features a sidebar with links to 'About', 'Members', 'Meeting Schedule', 'Meeting Minutes', 'Practitioner Profiles', 'National Organization', 'Educational Programs', 'Continuing Education', 'Licensure', and 'Complaints'. The main content area contains a 'POLICY STATEMENT ON CONTINUING EDUCATION' section with the following text: 'The Board accepts for license renewal, continuing education courses approved by the International Chiropractic Association, American Chiropractic Association and the Tennessee Chiropractic Association, and courses approved by the Federation of Chiropractic Licensing Boards - PACE (Providers of Approved Continuing Education) programs that are consistent with RULE 0260-02-.12. However, no courses approved by FCLB PACE on the topics of philosophy or practice-building are approved.' Below this text are links to 'Continuing Education Policy 02-28-2017', 'PACE Recognized Providers', and 'Tennessee Chiropractic Association Approved Seminars - 10.15.2020'. A bolded statement reads: 'Failure to comply with continuing education requirements may result in disciplinary action against the licensee or registrant. The disciplinary action will be reported on the Department of Health license verification web site.'

The second screenshot shows the Tennessee Chiropractic Association (TCA) website. It features a navigation menu with 'Dashboard', 'Home', 'Course Catalog', 'TN CE Requirements', and 'Main TN Chiro Website'. The main content area is titled 'TN CE REQUIREMENTS' and contains the following text: 'Tennessee CE Requirements: Doctors of chiropractic (DCs) are required to obtain 24 hours of approved continuing education (CE) each calendar year to maintain their license and remain compliant with the Tennessee Board of Examiners (BOE) rules and regulations. Tennessee chiropractic physicians may only obtain six (6) of these hours online. The other 18 hours can be taken at a TCA-sponsored event. You may visit the TCA's calendar page at [www.TNChiro.com](http://www.TNChiro.com) for an updated listing on available seminars. Licensed CTAs and CXTs must submit six (6) hours of approved CE per calendar year. Currently, online CE is not approved by the Tennessee BOE for CTAs or CXTs. The BOE accepts for license renewal, continuing education courses approved by statute (T.C.A. § 63-4-112) (International Chiropractic Association, American Chiropractic Association and the Tennessee Chiropractic Association), and courses provided by the Federation of Chiropractic Licensing Boards PACE (Providers of Approved Continuing Education) programs that are consistent with RULE 0260-02-.12. However, no courses approved by FCLB PACE on the topics of philosophy or practice-building are approved. CE Certificate Submission Effective January 1, 2019, the Tennessee Board of Chiropractic Examiners has partnered with CE Broker as their official CE tracking system. All annual CE for chiropractic licensees must be completed within the calendar year for which it is to be applied. To activate your free CE Broker account and upload and/or track CE hours go to: [www.cebroker.com/tn/plans](http://www.cebroker.com/tn/plans). Questions? Call (615) 532-5138 or visit [www.tennessee.gov/health](http://www.tennessee.gov/health). For more information on approval in states outside of Tennessee, please contact that state's Board of Chiropractic Examiners.'

## Conclusions regarding changes to Continuing Education

The M.C.C.A. does not oppose **fair updates** to advance the process of Continuing Education (C.E.) review while continuing the Board's primary obligation of protecting the health, safety and welfare of Michigan's citizens. The current onerous C.E. review process can be greatly reduced or eliminated in an honest and equitable manner that is fair to all, including the BOC, the state, as well as the various entities providing C.E. in Michigan. This correspondence has provided a thorough analysis and fair alternative options for the Board's consideration.

Utilizing an impartial arbiter of C.E. sponsor applications such as PACE will expedite and simplify the process with unbiased equality. Maintaining a direct Board application for a limited number of five applications per sponsor per year will tremendously reduce the Board's workload while maintaining fairness to all applicants and avoid conflict of interest issues or any appearance of impropriety. This would also serve as an appeal option in the event of any unfair denial. PACE is well-established, conforms to high-quality and well-accepted standards and is utilized nationwide by the vast majority of states. PACE would be an unquestionable fair choice. The Board of Chiropractic's Michigan-specific educational requirements would be maintained under PACE without concern. Licensees would still abide by all specific Michigan C.E. rules. The Board can remain confident that PACE participation does ensure the quality and integrity of continuing education under Michigan's distinct scope of practice while also meeting national standards.

If M.A.C. programs are automatically approved so should the M.C.C.A. programs. Both organizations have proven themselves long-term to have provided high-quality Chiropractic educational programs available to all D.C.'s statewide that consistently meet State of Michigan requirements. The rationale used to select favored organizations should be consistent.

The Board website should continue to list all approved courses regardless of reviewing entity. Initial presentation of *any approved C.E. course* should be eligible for 2 hours credit for each hour of presentation. This should not be limited to presenters from just 3 organizations. Chiropractic college courses should be automatically approved whether on-campus, off-campus or online. Perhaps in the era of surging valid online education it is time for the Board to consider modification of the 'live, in person' requirement for the 'physical measures' and 'performance and ordering of tests' while maintaining the rule limiting online courses to a maximum of 15 credit hours.

There are critical distinctions between a government entity as a regulatory body as opposed to a professional trade association. Each has a different role. Regulatory bodies serve to protect the interest of the *public*, ensure minimum *standards of education*, define the *code of conduct* for practitioners, receive and manage public complaints related to practitioner conduct, and discipline practitioners who have acted outside of acceptable guidelines. Professional associations serve its members interests, advocates for its members, lobbies government about policies, provides continuing education courses, and supports its members. It is important *not to blur the line* between a government entity as a regulatory body versus a trade association due to the critical distinctions listed; they serve different purposes. Handing unchecked absolute power to one entity that potentially competes with others would not be fair.

The protection of the public in a fair and honest manner, equitable to all parties involved, must be the focus of the Rule changes being discussed at this public hearing. The proposal by the Work Rules Committee Work Group should be modified to avoid any inherent conflict of interest. The Michigan Association of Chiropractors is a non-governmental, non-regulatory trade association with no oversight and no current 'checks or balances' on their own C.E. programming nor in the proposal under consideration today. Giving them sole review and oversight over all other C.E. sponsor applicants would not be fair. A variety of options are available to the Board and several reasonable compromise options have been described in this correspondence.

My personal longstanding and loyal membership in M.A.C. has shown me that it is right to speak out when unfairness or injustice are noted, as in the cases when insurance companies treat Chiropractors unfairly or establish policies that exclude or unreasonably reduce Chiropractic claims. Likewise, this letter is shared with you to speak out now in the name of justice and objectivity in the evaluation of Michigan Continuing Education. I respect and appreciate the M.A.C. and I am proud to be a member, but fair limits should be preserved.

I truly hope that you will honestly consider the fair options offered. There can be an honorable and impartial solution to the Continuing Education situation that would equitably serve all stakeholders.

I would be glad to further discuss this matter or respond to any questions you may have. Please feel welcome to call me at (586) 795-3366 or via email: [BLESTDAY@yahoo.com](mailto:BLESTDAY@yahoo.com)

Thank you very much for your consideration.

Sincerely,

*/s/ Martin J. Brown, D.C.*

Martin J. Brown, D.C.  
President,  
Macomb County Chiropractic Association

From the website of Federation of Chiropractic Licensing Boards:

# REGULATORY BODY

VERSUS

# PROFESSIONAL ASSOCIATION

COMPARING THE ROLES OF EACH

Protects the interests of the <b>public</b>	Protects the interests of the <b>profession</b>
<b>Ensures minimum standards</b> of education and practice	<b>Advocates for</b> the role and value of <b>practitioners</b> to the external stakeholders
Defines a <b>code of conduct</b> for practitioners	<b>Lobbies</b> government about policies related to professional practice
Receives and manages <b>complaints from the public</b> related to practitioner conduct	Provides <b>professional development</b> and education opportunities for its members
<b>Disciplines</b> practitioners who have acted outside acceptable practice guidelines	Provides <b>professional support</b> to its members

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chirpractic Proposal  
**Date:** Wednesday, January 13, 2021 9:53:32 AM

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**From:** Robert A. Manela, CPA <ramanela@aol.com>  
**Sent:** Wednesday, January 13, 2021 9:19 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chirpractic Proposal

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Simply:

I think it is utterly ridiculous for the Michigan Department of Licensing and Regulatory Affairs to allow the MAC, Michigan Association of Chiropractors approve Continuing Education courses for Chiropractors The authority for approval of courses and course providers should remain with the State.

Robert A. Manela, CPA  
Consulting CPA, PLLC  
2500 Quantum Lakes Drive, Suite 203  
Boynton Beach, Florida 33426  
Tel 561-213-1826 Fax 561-244-0503  
Cell 561-306-7733  
[www.Taxed.Biz](http://www.Taxed.Biz)

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**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: State Proposal on Chiropractic Continuing Education  
**Date:** Wednesday, January 13, 2021 8:09:36 AM

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**From:** Mark Manteuffel <manteuffel1@att.net>  
**Sent:** Wednesday, January 13, 2021 8:01 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** State Proposal on Chiropractic Continuing Education

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To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. I have been attending continuing education from the Macomb County Chiropractic Association (M.C.C.A.), for at least ten years now and do not want to be forced to change. Also, there is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C. I also believe, with no competition, the prices of C.E. courses can escalate.

The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider associations.

I request you re-think the process and open up the options to Michigan Chiropractic Physicians to better serve the citizens of our state through broader and more diverse course offerings. Competition is a good thing as well as choices for the Doctors. This is fair and good for the public.

Sincerely,

Dr. Mark Manteuffel DC  
Dr. Ron Manteuffel DC  
Dr. Larry Manteuffel DC  
Dr. Mark Wrobel DC

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: continuing education policy  
**Date:** Monday, January 11, 2021 6:56:14 AM

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**From:** ELAINE MARGOLIS <midler2@gmail.com>  
**Sent:** Friday, January 8, 2021 11:57 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>; Marty Brown <blestday@yahoo.com>  
**Subject:** continuing education policy

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*To the Policy Analyst of the State of Michigan and the Board of Chiropractic:*

*I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C. The Board of Chiropractic should be the authority, **not** a membership organization.*

*There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.*

*M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If M.A.C. is automatically approved, then M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar. Both are Chiropractic organizations providing C.E. in Michigan.*

*Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be*

*approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C. and not the public's interest.*

*Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.*

*Sincerely,*

Name: ElaineMargolis Email Address:  
[midler2@gmail.com](mailto:midler2@gmail.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: M.A.C. conflict of interest  
**Date:** Tuesday, January 19, 2021 1:42:36 PM

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**From:** Greg Mcfarland <drgregtnb@yahoo.com>  
**Sent:** Tuesday, January 19, 2021 12:34 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** M.A.C. conflict of interest

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To Whom It May Concern:

I was just made aware of the unbelievable conflict of interest from an group that I have supported for years. The Michigan Association of Chiropractors wants to assume control over approving what Continuing Education credits are acceptable. I have had a lifetime membership through Fetterman events for the last 3 years, which I have repeatedly utilized. I am very happy with my courses through Fetterman, and want to continue to utilize the courses taught by some of the top doctors in our profession. There is no excuse to give the M.A.C., or any other entity, a monopoly over an industry that affects so many people. This conflict of interest must be stopped now. Thank you for your time, and consideration in this matter.

-Sincerely,

Gregory K. McFarland, Jr., D.C.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic rules Public Hearing January 19,2021  
**Date:** Tuesday, January 12, 2021 7:03:57 AM  
**Attachments:** [Chiropractor Letter.pdf](#)

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**From:** asmehler@aol.com <asmehler@aol.com>  
**Sent:** Monday, January 11, 2021 8:41 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic rules Public Hearing January 19,2021

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To: Policy Analyst and Chiropractic Board Members

Please consider my letter attached above regarding the Chiropractic rules Public Hearing scheduled for January 19,2021.

Thank you.

Allen S. Mehler DPM

BPL-Boardsupport@michigan.gov

Dear Policy Analyst and Chiropractic Board members:

I am writing this letter for submission to the Chiropractic rules Public Hearing scheduled for January 19, 2021.

As a licensed Michigan Podiatrist for over 40 years I care about health care of citizens of our state. Our state's Board of Podiatric Medicine and Surgery offers 14 different categories of options in earning our required 150 hours of continuing podiatric medical education every 3 years. No single organization has sole authority over the review or approval of continuing Podiatric education. Our state Board is the authority.

I would be pleased to forward you the continuing medical education requirements for Michigan podiatrists. They are also available online through the L.A.R.A. website. In part the rules state: "*Attendance at or participation in a continuing education program or activity related to the practice of podiatry, or any non-clinical subject relevant to practice, education, administration management, or science, including, but not limited to, live and in-person programs; interactive or monitored teleconference or audio-conference programs; online programs; and, journal articles or other self-study programs offered by a sponsor accredited or approved by the **Council on Podiatric Medical Education (CPME)**.*" This is only one section of the 14 category options in earning the required hours of Podiatric continuing education.

I believe that the C.P.M.E. is the equivalent of P.A.C.E. for the Chiropractic profession and that a well-accepted National Provider Approval organization such as P.A.C.E. should be acceptable in the Chiropractic profession in Michigan as well. This would provide an accepted standard and have program applicants reviewed by a neutral party avoiding a possible conflict of interest inherent in giving such authority to the Michigan Association of Chiropractors (M.A.C.) which is a membership association and not a government agency.

The Podiatric profession offers continuing education credit for reading journal articles, attending online programs, self-study programs, writing articles, obtaining specialty certification, serving as an instructor, serving on a hospital staff committee, self-assessment media components including videos, webinars, multi-media programs and more. The options are vast. I recognize that not all of these varied educational options would be appropriate for Chiropractors, but restricting

review and approval of continuing education to the M.A.C. may not be equitable. P.A.C.E. is clearly a fair and better option for the Chiropractic profession.

Additionally, I see no reason to distinguish between courses presented on-campus or off-campus if the provider is an approved Chiropractic College. The institutions empowered to educate the profession should be able to make it convenient for attendees in the state of Michigan by having off-campus programs automatically approved by the Board. Further hurdles such as going through potential M.A.C. approval does not serve Chiropractors and may only serve the M.A.C.

M.A.C. continuing education offerings should rightly be subject to the identical review and approval procedures of any other provider of such courses. I do not believe that it is equitable to grant any individual membership organization a position above the rules of the Board. Empowering an association does not seem to be a fair vehicle for granting credit to providers of continuing education. It leaves open a potential conflict of interest. M.A.C. is not a part of the state government of Michigan and therefore I believe it should not be given such power over others.

Please carefully consider Board options that will be fair and consistent before altering the Board's authority over Chiropractic continuing education in our state. In honoring honesty, transparency and integrity the state of Michigan should allow the Board to approve continuing education not a state association.

I am hopeful that the Board will revisit this situation and be more open to a resolution that will fairly guide the rules of approval over continuing education. Thank you for your consideration.

Yours truly,



Allen S. Mehler, D.P.M.  
28857 Hidden Trail  
Farmington Hills, MI 48331  
[asmehler@aol.com](mailto:asmehler@aol.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Michigan Association of Chiropractors Comments for Public Hearing on Rule Set 2019-84 LR  
**Date:** Wednesday, January 13, 2021 2:12:33 PM  
**Attachments:** [MAC Public Hearing Testimony January 19, 2021.pdf](#)

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**From:** Tim Gaughan <tim@chiromi.com>  
**Sent:** Wednesday, January 13, 2021 2:12 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Michigan Association of Chiropractors Comments for Public Hearing on Rule Set 2019-84 LR

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Attention: Policy Analyst –

Attached is the written testimony on the proposed update to the following rule set: Chiropractic – General Rules (MOAHR #2019-84 LR). The Public Hearing for this proposed rule set is scheduled for Tuesday, January 19, 2021, at 1:00p.m.

Please advise that you have received these written comments for this Public Hearing.

Thanks you for your attention to this matter,

Tim Gaughan  
Communications Director  
Michigan Association of Chiropractors  
(517) 367-2225  
[tim@chiromi.com](mailto:tim@chiromi.com)

Department of Licensing and Regulatory Affairs  
Bureau of Professional Licensing – Boards and Committees Section  
P.O. Box 30670  
Lansing, MI 48909-8170  
Attention: Policy Analyst

Submitted via Email to: [BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)

RE: Michigan Association of Chiropractors Comments  
for Public Hearing on Rule Set 2019-84 LR

To Whom It May Concern:

We are writing today representing the Michigan Association of Chiropractors (MAC) to express our support for the proposed changes to the Michigan Board of Chiropractic's (BOC) Administrative Rules (R 338.12001 to R 338.12054), specifically R 338.12041, which governs continuing education. We believe that these needed changes will continue to protect the public and provide Michigan chiropractors with quality continuing education programs, while eliminating the burdensome continuing education review process currently employed by the State of Michigan.

We will also comment on R 338.12036(2), which outlines relicensure requirements for applicants whose license to practice chiropractic in Michigan has been lapsed for three years or more. This Rule is not altered in the proposed draft Rules, but we believe it warrants another look.

## **R 338.12041 Acceptable Continuing Education**

### **Overview of Proposed Rule Changes**

In short, regarding Michigan chiropractic continuing education, the proposed Rule will:

- Include a requirement that acceptable continuing education be approved or offered by the MAC, with the following exceptions:
  - A course or courses related to the practice of chiropractic which are offered on campus by an approved chiropractic school
  - The initial presentation of a continuing education program related to the practice of chiropractic to a state, regional, national, or international organization
- Rescind the rule allowing a proposed sponsor of continuing education to seek approval from the BOC to offer continuing education courses, since proposed continuing education providers would have to seek approval from the MAC.

### **Overview of Current Rules**

Under the current Rules, which were last updated January 29, 2020, the following programs are automatically approved by the State of Michigan and do not have to apply for continuing education credits with the BOC:

1. Successful completion of a course or courses related to the practice of chiropractic which are offered for academic credit in a chiropractic school approved by the board (Five CEs per semester credit allowed)

2. Attendance at or participating in a continuing education program or activity related to the practice of chiropractic that is offered on campus at a chiropractic school
3. Attendance at a continuing education program or activity related to the practice of chiropractic that is offered by the Michigan Association of Chiropractors

Organizations can also petition the board for approval of a continuing education program. Additionally, licensees can also receive continuing education credit for the initial presentation of a continuing education program related to the practice of chiropractic to the American Chiropractic Association, the International Chiropractors Association, the Michigan Association of Chiropractors, or an organization approved by the board (Two hours of CE for each 50 to 60 minutes of presentation, for a maximum of 10 hours of continuing education in each renewal period).

**Overview of Current Review Process**

Currently, organizations requesting approval of a continuing education program file an Application for Approval of a Chiropractic Continuing Education Program with the Michigan Department of Licensing and Regulatory Affairs’ Bureau of Professional Licensing, which then sends the application and all supporting documents to the BOC for review. The BOC has a Continuing Education Committee that is assigned to review all incoming applications and make a recommendation to the full Board if the program should be approved or not approved. The full BOC then votes whether to approve these recommendations at their next regularly scheduled meeting.

**Rationale for Proposed CE Approval Change**

Administrative Burden: Through the November 2020 meeting of the Michigan BOC, 302 chiropractic continuing education programs were approved by the Board, more than three times the number for 2019 and much higher than in the previous six entire years:

2019	99
2018	128
2017	86
2016	73
2015	92
2014	105

This abrupt increase in the number of continuing education program applications, likely the result of the changes made to the Administrative Rules and finalized in 2019, has greatly increased the administrative burden placed on the Michigan Department of Licensing and Regulatory Affairs, the Bureau of Professional Licensing, and the Michigan Board of Chiropractic’s Continuing Education Committee.

Timeliness: Currently, the Michigan BOC only meets four times per year – in February, May, August, and November. If a meeting is cancelled for one reason or another (as has happened in the past due to weather conditions surrounding the February and November meetings, for example), it could be six months between meetings, creating uncertainty among both licensed chiropractors seeking continuing education hours for license renewal and the organizations wishing to provide these programs. In the past, we have seen, because of these delays, CE classes that Michigan DCs counted on being approved,

not being approved until long after the class was offered, and even denied after the class was held and attended.

A streamlined approval process independent of the Michigan BOC allows for much faster approval, eliminating this uncertainty and allowing organizations to present more timely programs benefitting the profession.

As proposed, the Rule changes being discussed today will benefit the public and Michigan chiropractors by utilizing a streamlined process that outsources these duties to the MAC. MAC programs are already approved for continuing education without going through the application process, the result of the recent changes to the Administrative Rules that were approved and went through the public hearing process four years ago, acknowledging the MAC's years of high-quality programs that consistently meet State of Michigan requirements.

The MAC has the nonprofit legal structure, expertise, experience, and well-informed staff to provide professional evaluation that strictly follows the guidelines for approved continuing education outlined in the State of Michigan Administrative Rules. Outsourcing these duties would ease the current burdensome process, freeing up State of Michigan staff and other scarce resources that the State increasingly does not have, while ensuring that the quality of programs in the state continue to meet the current standards.

Other States: There are precedents among other states and professional organizations for taking such action.

- Kansas: The Kansas State Board of Healing Arts, which oversees the practice of chiropractic and other health professions in the state of Kansas, has delegated the authority for the review and approval of chiropractic continuing education programs to the Kansas Chiropractic Association (KCA). The KCA Continuing Education Committee reviews and approves all continuing education for DCs in the state of Kansas. The committee reviews the course content and qualifications of speakers, then determines the hours of credit, classifies the hours, or determines that the program is not approved.
- Tennessee: The Tennessee Board of Chiropractic Examiners accepts for license renewal continuing education courses not just conducted by, but also approved by, the Tennessee Chiropractic Association.
- PACE: Some states outsource the approval of chiropractic continuing education to the Federation of Chiropractic Licensing Board's (FCLB) Providers of Approved Continuing Education (PACE) program. In Rules discussions over the past three years, however, members of the BOC's Rules Committee Work Group expressed the opinion that they did not want to rely on PACE for continuing education, as the State of Michigan is not a member of the FCLB and standards that need to be followed for CE PACE's standards are not specific to the state of Michigan. By keeping the ability to approve chiropractic continuing education within the state, whether with the BOC or an outside entity, the BOC wanted to ensure that continuing education conforms to the state's chiropractic scope of practice as well as national standards for chiropractic practice.

### **Conclusion – R 338.12041 Acceptable Continuing Education**

We believe that the model proposed by the Rules Committee Work Group and approved by the BOC would be an outstanding solution to the administrative issues facing the Board. By outsourcing to the MAC, the State would ensure that CE programs continue to be state-specific, accounting for the Michigan chiropractic scope of practice and current trends in Michigan chiropractic practice, rather than a one-size-fits-all, national approach that ignores individual state requirements and /or needs. We feel that it is imperative that standards that understand the intricacies of Michigan's chiropractic scope, Administrative Rules, and issues facing the profession specific to our state are maintained, while continuing to allow only the highest quality programs for continuing education.

### **R 338.12036(2) Relicensure**

Prior to the re-write of the Rules that was completed in 2019, all applicants for relicensure were required to satisfy *EITHER* of the following:

- 45 hours of continuing education in the preceding three years, with all the outlined requirements, *or*
- Have been licensed as a chiropractor in another state of the United States during the three-year period immediately preceding the application for relicensure.

This was changed in the most recent re-write of the Rules. Now, doctors seeking Michigan relicensure after their license has been lapsed for three years or more are required to have the 45 hours of continuing education **AND** either:

- Have been licensed in another state for the three years preceding the application
- Have passed the National Board of Chiropractic Examiners Special Purposes Examination for Chiropractic (SPEC)

**We feel that this is overly burdensome on doctors seeking relicensure**, and that if a doctor has been continuously licensed in another state for the three years immediately preceding application for re-licensure, has been following that state's continuing education rules, and has no sanction against his or her license in that other state, they are presumed to have the skills to practice chiropractic in the state of Michigan.

We also do not believe that passing the NBCE SPEC examination is necessary to establish the presumption of having the skills and ability to practice chiropractic in the state of Michigan.

It is also important to note that if a doctor had never been licensed in Michigan at all, the process to get a license is much less cumbersome, but because someone may have gotten a Michigan license right out of school but then moved to another state to practice, and now wants to come back, they must follow a completely different and more stringent set of rules.

We would like to see the rule re-written to be more in line with the Rule prior to the previous re-write, in which chiropractors have access to two methods in which to gain re-licensure:

1. Continuing Education; or,
2. Having been continuously licensed in another state for the immediate past three years

We believe that changing the relicensure rule in this way would fulfill the Board's duty to protect both the general public and the profession itself, while easing a burdensome requirement on applicants for relicensure whose license has been expired for three years or more.

**In closing, the MAC Board of Directors and leadership feel that the proposed changes to the Michigan BOC Administrative Rules governing continuing education will greatly benefit the licensed chiropractors in our state and the State of Michigan itself.**

**We also believe that changing the Rule governing relicensure for chiropractors whose license to practice has been expired for three years or more would remove an overly burdensome requirement facing these doctors.**

We appreciate your taking the time to consider these modifications. If you have any questions or concerns, please do not hesitate to contact us in care of the Michigan Association of Chiropractors at (517) 367-2225 or [info@chiromi.com](mailto:info@chiromi.com).

Sincerely,



Lisa Olszewski, DC  
President  
Michigan Association of Chiropractors



Kristine Dowell  
Executive Director  
Michigan Association of Chiropractors

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Continuing Education Proposal  
**Date:** Monday, January 18, 2021 2:39:37 PM

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**From:** Jean Mikula <[chirojean@comcast.net](mailto:chirojean@comcast.net)>  
**Sent:** Sunday, January 17, 2021 4:18 PM  
**To:** BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
**Subject:** Chiropractic Continuing Education Proposal

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Dear State Policy Analyst,

I am a licensed chiropractor in MI. I am opposed to the proposal to change the way that continuing education courses are selected in MI. Changing the rules, and giving a trade association the power to oversee the selection of continuing education topics can be unfair to chiropractors and chiropractic patients because of a potential conflict of interest.

Please keep the rules the same by allowing the Michigan Board of Chiropractic to approve courses for continuing education, and do not approve the proposal to allow any trade association to approve the topic of courses.

I don't want to see a conflict between the State Board and the state's trade association. Thank you for your time.

Sincerely,

Jean Mikula, D.C.

Mikula Chiropractic, P.C.

Grand Rapids, MI

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Not ALLOW M.A.C. TO MONOPOLIZE SEMINARS.  
**Date:** Wednesday, January 13, 2021 7:04:45 AM

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**From:** Richard Mirowski <rjmirowski@hotmail.com>  
**Sent:** Tuesday, January 12, 2021 7:50 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Not ALLOW M.A.C. TO MONOPOLIZE SEMINARS.

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Sent from [Mail](#) for Windows 10

This letter is not to allow M.A.C. to try to monopolize seminars for continuing chiropractic education.

I have been going to the M.C.C.A for 26 years for my continuing education it is close, convenient and cost effective.

Doctors from all over the united states are hiered to teach at these seminars and has been vary educational. The seminars

are all done on a weekend and have worked for many years. if something works it don't have to be fixed or monopolize it. I have

Not had to take off work so that my patients can receive the care they need ,I do not have to traveling far, waist gas or get a hotel room.

There is a conflict of interest of other organization that put a lot of time and money for these seminars and it would be unfair to allow

One association to have atrority over the others. Classes offererd by chiropractic colledges should be atomaticly approved weather they are taught on campos or off campos

Their is no reason to separate on campos from off campos for automatic approval. There is an acceptable national organization that approves chiropractic

Corses providers known as PACE. PACE IS USED BY MOST OF THE STATES. Please let fairness rule for the Michigan Chiropractors on continuing education.

Sencerly,

Richard Mirowski D.C.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: NO FOR MAC TAKEING OVER  
**Date:** Tuesday, January 19, 2021 12:10:02 PM  
**Attachments:** [image003.png](#)  
[image004.png](#)

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**From:** Clewley, Linda (LARA) <[clewleyl@michigan.gov](mailto:clewleyl@michigan.gov)>  
**Sent:** Tuesday, January 19, 2021 12:07 PM  
**To:** BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
**Subject:** FW: NO FOR MAC TAKEING OVER

Good afternoon,

I'm forwarding an email regarding chiro continuing education programs.

Thank you,  
Linda

Linda Clewley, Manager  
Licensing Division – Licensing Team #2  
Bureau of Professional Licensing  
(517) 241-9236  
[clewleyl@michigan.gov](mailto:clewleyl@michigan.gov)



PROTECT PEOPLE &  
PROMOTE BUSINESS



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**From:** [drivenmusic1@wowway.biz](mailto:drivenmusic1@wowway.biz) <[drivenmusic1@wowway.biz](mailto:drivenmusic1@wowway.biz)>  
**Sent:** Saturday, January 16, 2021 9:18 PM  
**To:** BPLHelp <[BPLHelp@michigan.gov](mailto:BPLHelp@michigan.gov)>  
**Subject:** NO FOR MAC TAKEING OVER

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To: [BPL-boardsupport@Michigan.gov](mailto:BPL-boardsupport@Michigan.gov)  
Subject: Opposing M.A.C. control over Continuing Education in Chiropractic  
Please note that I mistakenly sent a draft version of this email previously which you may disregard. This is the corrected version of the email, now checked for grammar and spelling. Thank you.

This letter is sent to you for the public hearing of January 19, 2021 opposing M.A.C. monopolizing control over Chiropractic continuing education.

I have attended continuing education seminars by the Macomb County Chiropractic Association (M.C.C.A.) for 26 years and I have been very pleased with the convenience and cost effectiveness as well as the quality content of these seminars. Doctors are hired from all over the United States to teach at these seminars and they are very educational and valuable. The seminars are nearby so I avoid wasted travel time and hotel expense and I minimize my time away from my office. When something works it does not need fixing!

I oppose any monopoly over control of Chiropractic continuing education by the M.A.C. There is a conflict of interest as the M.A.C. puts on their own courses which compete with other providers like the M.C.C.A. It would not be fair for one association to have authority over the others.

Also, classes offered by Chiropractic Colleges should be automatically approved whether they are taught on-campus or off-campus.

There is an acceptable national organization known as P.A.C.E. to review and approve continuing education providers. P.A.C.E. is used by most of the states. Please let fairness rule for Michigan's Chiropractors in continuing education. Thank you.

Sincerely,

Richard Mirowski, D.C.

On Tuesday, January 12, 2021, 7:53:56 PM EST, Richard Mirowski wrote:

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic CE concerns  
**Date:** Monday, January 18, 2021 2:39:57 PM

---

**From:** dmorgandc@aol.com <dmorgandc@aol.com>  
**Sent:** Sunday, January 17, 2021 6:38 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic CE concerns

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and view other C.E. providers as competitors. There would be no 'checks and balances' over the authority being offered to the M.A.C.

I am a long-time member of the M.A.C. and have presented C.E. seminars for the M.A.C, Macomb County Chiropractic Association, Omni seminars and for the past five years for Fetterman Events. I can tell you with certainty that there is an adversarial relationship between the M.A.C and the other C.E. companies and this has originated and been perpetuated by the M.A.C. A colleague and past president of the M.A.C. called me with warnings and veiled threats regarding my involvement with Fetterman Events. I've seen this same officer of the M.A.C posting on chiropractic pages on social media very disparaging remarks about Fetterman Events and other C.E organizations while promoting the C.E. programs sponsored by the M.A.C. and state associations.

The chiropractic board of Examiners already has an overwhelming connection and involvement with the M.A.C. as the chiropractor members of the board includes members of the organization and past officers. At least in the current situation this is in part balanced out by the public members of the board. If the M.A.C becomes the only entity approving C.E. seminars, this will most likely eliminate all competing seminars. It might be worth noting that the M.A.C seminars are among the costliest of the various programs offered in Michigan.

All presentations and seminars from Fetterman Events are approved by both a chiropractic college and P.A.C.E. Also, the Fetterman presentations do not include any practice building, entrepreneurial or sales presentations. The M.A.C. can't make this claim.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Dale A. Morgan, DC

[dmorgandc@aol.com](mailto:dmorgandc@aol.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Continuing Education  
**Date:** Tuesday, January 19, 2021 7:07:17 AM

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**From:** jmorgan23@aol.com <jmorgan23@aol.com>  
**Sent:** Tuesday, January 19, 2021 12:55 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Continuing Education

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should not be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus OR Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail. Thank you very much.

Sincerely,

Jennifer Morgan  
[Jmorgan23@aol.com](mailto:Jmorgan23@aol.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: For Public Hearing on January 19, 2021 (Chiropractic Rules)  
**Date:** Monday, January 18, 2021 2:29:35 PM

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**From:** Dr. Reena Pathak <dr.reenapathak@gmail.com>  
**Sent:** Thursday, January 14, 2021 9:49 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** For Public Hearing on January 19, 2021 (Chiropractic Rules)

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. I believe it is important for the Board of Chiropractic (BOC) to continue having the continuing education review process currently employed by the State of Michigan. The Board of Chiropractic should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body.

Giving M.A.C. full rights to continuing education approval is unfair and indicates a lack of integrity in the chiropractic profession. I believe that these unnecessary changes will not protect the public and may potentially provide Michigan chiropractors with reduced quality continuing education programs. If anything, it likely monopolizes the CE market, potentially restricting choice of programs and ultimately may degrade the quality and variety of CE courses available. Having the BOC continue to do the approval of CE credits allows for multiple organizations to fairly and equitably have access to course offerings reflecting the diverse perspectives within the profession. Requiring other organizations to seek approval for courses through M.A.C. raises concerns. M.A.C. offers their own courses which is a conflict of interest.

An association's main directive is to provide access to CE courses. They are not a regulatory body. If the case can be made that associations should be regulatory bodies, then all associations should be able to provide approval of CE courses, especially if they also provide high quality CE programs. For example, Macomb County Chiropractic Association (M.C.C.A) held a live, online portion for their yearly seminar that was trackable for chiropractors logging in and was compliant for CE hours. M.C.C.A has the platforms and ability to keep track for

compliance purposes. It is my question then, why M.A.C. should be the only association with automatic approval.

Having an independent regulatory board is the hallmark for any regulated health profession. Fairness and equal review of all proposed CE programs should be maintained. Giving M.A.C. sole authority for approving courses is an obvious and direct conflict of interest. If M.A.C. programs are automatically approved without requiring any application or review then M.C.C.A. programs should be automatically approved as well.

The argument that P.A.C.E. provides a 'one size fits all' approach and courses provided are not specific to the state of Michigan is a non-issue as the Board retains control over the number of hours and special topic content areas required for continuing education. Chiropractors are aware of the components of the required continuing education and will continue to be responsible in fulfilling all state mandates.

If the BOC is overwhelmed by the quantity of applications for CE course review then an impartial arbiter such as P.A.C.E. should be utilized by the BOC. It is unethical to give authority for such review and approval to a single association, particularly when that association, M.A.C. does not even have their own CE courses reviewed or approved, without oversight. Furthermore, there is no logical reason to have any programs of accredited chiropractic colleges reviewed by M.A.C., whether the college course is offered on-campus or off-campus.

I ask that the BOC rethink the decision they have made on the proposed rules as it is not in the best interest of chiropractors or the general public. Fairness, equity and integrity should be the utmost concern in our profession. Thank you very much.

Sincerely,  
Reena Pathak, D.C.  
[1112 Lawndale Drive](#)  
[Royal Oak, MI 48067](#)

*This e-mail may be privileged and/or confidential, and the sender does not waive any related rights and obligations. Any distribution, use or copying of this e-mail or the information it contains by other than an intended recipient is unauthorized. If you received this e-mail in error, please advise me (by return e-mail or otherwise) immediately.*

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: NO! NO! NO!  
**Date:** Monday, January 18, 2021 2:37:32 PM

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-----Original Message-----

From: Theresa Pigott <drtpigott@hotmail.com>  
Sent: Sunday, January 17, 2021 10:51 AM  
To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
Subject: NO! NO! NO!

CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)

Dear BPL,

I OPPOSE the up coming change to give MAC-Michigan Association of Chiropractors the authority over our continuing education. This is a specific and small representative group and does not represent the entire group of Chiropractors in the State of Michigan.

This would be an unfair, and lopsided balance of power in this fragile system, in my opinion.

A valid, fair, and excellent option is for P.A.C.E. -Providers of Approved Continuing Education to be the authority in this matter.

All health care workers have added burdens on their plate right now treating COVID patients, trying desperately to keep their practices running, managing fear in their patients, all while providing quality care. Please do not add more obstacles into the mix.

The majority of Chiropractors do the lawful thing in getting the approved amount of CEU's, and we want this process to continue to be fair, balanced, and unbiased.

Please oppose this upcoming vote and change.

I have been a Chiropractor for 27 years in this great State, I've seen many changes good and bad, please do the right thing in this case.

Sincerely,  
Dr. Theresa M. Pigott  
Chiropractor

Sent from my iPad

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Opposed to MAC having sole authority over CE/ Chiropractic in Michigan  
**Date:** Thursday, January 7, 2021 11:52:17 AM

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**From:** Gina Roberts <ginazachandy@hotmail.com>  
**Sent:** Thursday, January 7, 2021 11:41 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Opposed to MAC having sole authority over CE/ Chiropractic in Michigan

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of State of Michigan and the Board of Chiropractic,

I am writing to oppose the rule under consideration which would give the M.A.C. sole authority over our C.E. here in Michigan. The board should maintain the distinction between a membership based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a conflict of interest as the M.A.C. offers C.E. courses and may view other C.E. providers as competitors. There would be no neutral authorities to oversee this. There are better options such as Providers of Approved Continuing Education (P.A.C.E.) which offers a more neutral based review process for C.E. organizations.

M.A.C. should not be granted the authority over our continued education courses. All C.E. provider organizations should apply and be reviewed by the state board or by P.A.C.E. as an independent oversight.

Please reconsider the process and open up options to better serve our profession and be fair to all. The state boards role is to protect our profession and be fair as well.

Thank you,  
Dr Regina Roberts, DC  
Authentic Living Center  
Troy MI

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: For the Public Hearing. - Dear Policy Analyst and the Michigan Board of Chiropractic  
**Date:** Monday, January 11, 2021 7:18:27 AM

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**From:** Marty <idocmarty@yahoo.com>  
**Sent:** Sunday, January 10, 2021 3:14 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** For the Public Hearing. - Dear Policy Analyst and the Michigan Board of Chiropractic

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

*For the Public Hearing – Dear Policy Analyst and Michigan’s Board of Chiropractic:  
This letter is sent in reference to the public hearing scheduled for [January 19, 2021](#) regarding the chiropractic rules changes that have been proposed.*

*The proposed rule change giving the Michigan Association of Chiropractors (M.A.C.) the power of reviewing and approving the continuing education would be unfair and inappropriate due primarily to the conflict of interest since M.A.C. provides continuing education and would have authority over other businesses and organizations that provide such courses. M.A.C. is not a state regulatory arm and serves it’s membership. M.A.C. may be a fine organization but authority over a regulatory matter should be reserved for a state agency or a neutral national entity established to fairly administer the providers of continuing professional education. Blurring the line between a membership association and a state governmental Board would be misguided.*

*I am a Doctor of Optometry in the state of Michigan and I am an active member of the American Optometric Association as well as the Michigan Optometric Association (M.O.A.) I attend required continuing educational programs necessary for my licensure. These courses are available from a variety of providers approved by the Michigan Board of Optometry. In addition to Board-approved educational programs, any educational programs accredited by the Council of Optometric Education (C.O.P.E.) or by any Board-approved schools of Optometry are automatically accepted. This would be a very fair and acceptable model that the Michigan Board of Chiropractic could duplicate. The counterpart organization for C.O.P.E. in Chiropractic is P.A.C.E. which should be very suitable for Michigan’s Chiropractors.*

*In Optometry no distinction is made between an approved Optometry school program given on-campus or off-campus and this should apply in Chiropractic as well. I am pleased with the Michigan Optometric Association programs but it would be wrong for*

*the state's Optometry Board to give the M.O.A. authority to review and/or approve Optometric continuing education. Likewise the M.A.C. organization should remain a membership organization but not a regulatory body over Chiropractic's continuing educational programs.*

*Government policies should always be just and fair. Placing one association over other educational providers would not be just or equitable in any way. All providers should be reviewed equally by a neutral entity.*

*I am writing because I genuinely care about health care and fairness in Michigan. I anticipate that the hearing on this matter will emphasize justice and that the Optometric Board's method of educational approval will be duplicated by Michigan's Chiropractic Board. I appreciate your consideration. Thank you for allowing public comment on this serious situation.*

*Sincerely yours,*

*Martin Rudick, O.D.*

*Email: [idocmarty@yahoo.com](mailto:idocmarty@yahoo.com)*

*SVS Vision Optical*

*[455 East Grand River](#)*

*[Brighton, MI 48116](#)*

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW:  
**Date:** Monday, January 18, 2021 2:46:41 PM

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**From:** Jeremy Rudkin <jeremyrudkin@yahoo.com>  
**Sent:** Monday, January 18, 2021 10:42 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:**

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to

better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Name: Jeremy Rudkin D.C. \_\_\_\_\_ Email Address:  
[jeremyrudkin@yahoo.com](mailto:jeremyrudkin@yahoo.com)\_\_\_\_\_

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Letter to oppose Michigan Assoc of Chiropractors rule change  
**Date:** Monday, January 18, 2021 2:37:33 PM  
**Attachments:** [Letter to the SOM and board for the MAC.pdf](#)

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**From:** Dr Paula Ruffin DC <[chirodog@gmail.com](mailto:chirodog@gmail.com)>  
**Sent:** Sunday, January 17, 2021 9:18 AM  
**To:** BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
**Subject:** Letter to oppose Michigan Assoc of Chiropractors rule change

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Dr. Paula L. Ruffin, DC  
***New Hudson Chiropractic Wellness Center, P.C.***  
Office: (248) 486-5684  
Cell: (248) 981-8105  
[www.drruffin.com](http://www.drruffin.com)

17 January 2021

**To the Policy Analyst of the State of Michigan and the Board of Chiropractic:**

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should NOT be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why is M.A.C. 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association), Omni Chiropractic, Metagenics Midwest, and others who provide continuing education courses should also be automatically approved for their annual C.E. seminars.

Chiropractic College C.E. courses should be automatically approved whether classes are offered on-campus OR off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved on-campus, forcing Michigan Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings **without a conflict of interest**. The state Board's role is to protect the public, **not** to protect the M.A.C. Fairness should prevail. Thank you very much.

Sincerely,

Paula L. Ruffin DC

Email: [chirodog@gmail.com](mailto:chirodog@gmail.com)

Office (248) 486-5684

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Continuing Education  
**Date:** Tuesday, January 12, 2021 3:50:32 PM

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**From:** Dr. Craig Shaeffer <shaefferchiro@hotmail.com>  
**Sent:** Tuesday, January 12, 2021 3:06 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic Continuing Education

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To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Dr Craig Shaeffer

[shaefferchiro@hotmail.com](mailto:shaefferchiro@hotmail.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: CE for Chiropractors in Michigan  
**Date:** Monday, January 18, 2021 2:50:02 PM

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**From:** Grand River Chiropractic <grandriverchiropractic@yahoo.com>  
**Sent:** Monday, January 18, 2021 12:29 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** CE for Chiropractors in Michigan

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Good Day!

To the Policy analyst of the State of MI and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. I believe the Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest. Since the M.A.C. offers Continuing Education (C.E.) courses and they view other C.E. providers as competitors. Then there are no 'checks and balances' over the authority being offered to the M.A.C.

I believe there are alternative ways that will make it more fair and reasonable, that are consistent with the goal of continuing education for chiropractors. The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations. We believe this is a great safeguard that's already in place.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, then the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Furthermore, Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much!

Sincerely,

Dr. Martha Schneider

[grandriverchiropractic@yahoo.com](mailto:grandriverchiropractic@yahoo.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Change to MAC  
**Date:** Tuesday, January 12, 2021 2:31:11 PM

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**From:** Ken Schultz <zukey46@gmail.com>  
**Sent:** Tuesday, January 12, 2021 2:29 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Change to MAC

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Not the Time or Place for a Monopoly on choices in continuing education! Fetterman has always been an Excellent provider and presenter of CE courses! Thank you for your consideration.  
Kenneth W Schultz DC

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: new chiropractic continuing ed rules  
**Date:** Tuesday, January 5, 2021 2:02:05 PM

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**From:** Brian Seefeldt <ffchiro@sbcglobal.net>  
**Sent:** Tuesday, January 5, 2021 2:00 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** new chiropractic continuing ed rules

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to

better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Brian Seefeldt, DC

[ffchiro@sbcglobal.net](mailto:ffchiro@sbcglobal.net)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Continuing education concerns  
**Date:** Monday, January 11, 2021 7:19:24 AM  
**Attachments:** [img005.pdf](#)

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**From:** Bruce Serven <[servenchiro@gmail.com](mailto:servenchiro@gmail.com)>  
**Sent:** Sunday, January 10, 2021 6:11 PM  
**To:** BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
**Subject:** Continuing education concerns

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

I would like you to please read the letter that is attached regarding an up and coming decision by the BOC.

Bruce Serven

# Dr. Bruce D. Serven

*Certified Chiropractic Sports Physician  
Family Practice and Sports Injuries*

G- 4010 West Court Street

Flint, MI 48532

t810-732-2210

Fax: 810-230-0158

January 10, 2021

State of Michigan Board of Chiropractic Examiners  
Bureau of Professional Licensing- Board Support

Policy Analyst of the State of Michigan and the Board of Chiropractic,

It has been brought to my attention that there is a rule under consideration which would give the Michigan Association of Chiropractic (MAC) the sole authority for authorizing continuing education courses. Having been in practice in the State of Michigan for 36 years and being a former member of the MAC for 28 years, it is my opinion this potential decision and action would not be in the best interest for the chiropractic profession as a whole. It is my opinion the Board of Chiropractic should remain in control of making the determinations on appropriateness and approval of all continuing education. The MAC is not a governmental body. It is a membership based trade association that puts on continuing education seminars itself. While I would like to believe that the association can remain neutral and ensure that all persons, companies, and/or associations that would have an interest in putting on continuing education seminars would still be able to do so, I am not optimistic that realistically that would happen. The MAC has not always displayed its ability to do the best for the entire profession with its decisions. We need a governing body that has no vested interest in continuing education to remain in control of what is considered as being appropriate. My concern would be that other companies and/or associations who have been around for a number of years would be unable to get authorization for their seminars simply because they are "competitors" of the MAC. We live in a free country based on capitalism. This would mean that anyone who would want to put on a continuing education seminar should have the right and ability to do so. Putting the MAC in charge of continuing education would be very similar to putting the fox in charge of guarding the hen house. Not a good idea! It is my opinion there is a very large conflict of interest present in this potential rule. The only persons that this rule would benefit would be the MAC itself. The profession as a whole would not benefit or advance forward from this decision. The purpose of a trade association, such as the MAC, is to represent the best interests of ALL of its members and/or profession. That association should be able to put on its own continuing education seminars. But, the association should NOT have the sole control of authorizing the remainder of the continuing education seminars available thru out the state. That responsibility should remain where it currently is, with the Board of Chiropractic Examiners. The BOC has chiropractors on its panel who should be able to effectively determine if the proposed seminars would meet criteria established by the BOC itself. Putting the control of the continuing education seminars with the MAC removes the intended checks and balances that are currently present. There are several

other options that are available if the BOC does not want to control these decisions. One such option is P.A.C.E. (Providers of Approved Continuing Education).

In summary, I would urge you to re-think the decision to transfer the authority of continuing education to the MAC. I would urge you to look at other available options for controlling continuing education. Please do not put the fox in charge of guarding the hen house.

Respectfully,

A handwritten signature in black ink, appearing to read 'B. Serven', with a stylized flourish at the end.

Bruce D. Serven, D.C., C.C.S.P.

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Conflict of Interest  
**Date:** Tuesday, January 5, 2021 4:28:47 PM

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-----Original Message-----

From: ronda shallow <[drronda@mac.com](mailto:drronda@mac.com)>  
Sent: Tuesday, January 5, 2021 3:40 PM  
To: BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
Subject: Re: Conflict of Interest

CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)

That is Macomb County Chiropractic Association.  
Make it Fair!  
Thank you very much  
[drronda@mac.com](mailto:drronda@mac.com)

Sent from my iPhone

> On Jan 5, 2021, at 3:37 PM, ronda shallow <[drronda@mac.com](mailto:drronda@mac.com)> wrote:

>

> Dear Members of Board of Chiropractic, The state Board's role is to

> protect the public not the M.A.C.

> Please understand the conflict of interest involved and rethink the process of delegating M.A.C. Granted automatic C.E. Approval!

> There must be Independent Oversight. Why is M.A.C. 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macon County Chiropractic Association) should also be automatically approved for there annual C. E. Seminar.

> Fairness should Prevail.

> [drronda@mac.com](mailto:drronda@mac.com)

>

> Sent from my iPhone

**From:** [Thomas Steinbis](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Cc:** [Nate Shannon](#); [Triemstra, Marnie \(LARA\)](#)  
**Subject:** Rep Shannon Letter Regarding Pending rule set #: 2019-84 LR Board of Chiropractic – General Rules Rule numbers: R 338.12001 R 338.12054  
**Date:** Thursday, January 7, 2021 2:34:18 PM  
**Attachments:** [Shannon\\_ChiroLetter.pdf](#)

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Wes,

Please see attached letter from Rep. Nate Shannon. He has questions regarding upcoming rule changes in public comment with the Board of Chiropractic.

Thank you,

Thomas Steinbis  
Office of Rep. Nate Shannon  
Legislative Director  
517-373-2275



25TH DISTRICT  
STATE CAPITOL  
P.O. BOX 30014  
LANSING, MI 48909-7514

MICHIGAN HOUSE OF REPRESENTATIVES

**NATE SHANNON**

STATE REPRESENTATIVE

PHONE: (517) 373-2275  
FAX: (517) 373-5910  
NateShannon@house.mi.gov

Michigan Board of Chiropractic  
Wes MacIntosh, Board Analyst

1/6/2021

To the Michigan Board of Chiropractic,

It has come to my attention that the board through its normal process is reviewing some potential rule changes regarding Chiropractic Continuing Education programs. These changes to my knowledge would delegate the boards statutory authority to approve CE programs to an outside association.

I am currently reaching out to seek more information on the reasoning and discussion you have had regarding this decision. If the board could provide my office with answers to the attached questions and further details on why the board feels it is necessary to make these changes, but also how other states go about handling these particular issues the board is facing. Any and all information you send me will be very helpful in giving me a better understanding of the current position of the board.

Thank you in advance for taking the time to provide me further clarifying details regarding the current discussions within the Board of Chiropractic. I know that everyone within the board is looking out for the health and wellbeing of the residents of this great state with every action that they take. Thank you for giving the residents of Michigan some of your valuable time and expertise.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Shannon".

Nate Shannon  
State Representative  
House District 25



25TH DISTRICT  
STATE CAPITOL  
P.O. BOX 30014  
LANSING, MI 48909-7514

MICHIGAN HOUSE OF REPRESENTATIVES

**NATE SHANNON**

STATE REPRESENTATIVE

PHONE: (517) 373-2275  
FAX: (517) 373-5910  
NateShannon@house.mi.gov

- 1.) The proposed rules would give the trade association Michigan Association of Chiropractors (M.A.C.) the role of review and approval of Chiropractic Continuing Education (C.E.) in Michigan. The M.A.C. offers C.E. courses potentially competing with other organizations and businesses M.A.C. would oversee, thus there is a conflict of interest. How do you address the conflict of interest?
- 2.) What checks and balances would be placed on M.A.C. as the overseer of Chiropractic Continuing Education? Why wouldn't there be a concurrent application process directly to the Board of Chiropractic for applications as well?
- 3.) Is the Board aware of the national organization, F.C.L.B. (Federation of Chiropractic Licensing Boards) which has established P.A.C.E. (Providers of Approved Continuing Education) with an accepted nationwide rigorous review process used by the majority of state Chiropractic Boards? If so, why is P.A.C.E. not a proposed option for the new rules?
- 4.) Why is MA.C. being granted oversight of other C.E. providers while they are exempted from submitting any application for review? Why is M.A.C., a major provider of C.E., placed above the rules? Why can't M.A.C. apply to the state Board or to P.A.C.E. for review?
- 5.) Chiropractic Colleges provide courses both on-campus and off-campus including courses given in our state, off-campus. As there are no Chiropractic Colleges in the state of Michigan why aren't off-campus courses automatically approved just as on-campus courses are?
- 6.) The pandemic has demonstrated the need for flexibility in education statewide and Chiropractic C.E. should be made more accessible with less risk and travel for our state's Chiropractic Physicians thus I ask you to clarify why the proposed rules restrict off-campus courses to M.A.C. approval.
- 7.) The primary obligation of the Board of Chiropractic is to protect the public's health, safety and welfare. Wouldn't it be more beneficial for the Board of Chiropractic to endorse multiple C.E. course approval options to benefit the public with potential added depth and variety of Continuing Education?
- 8.) Why is the Board of Chiropractic elevating a non-regulatory, non-governmental, membership organization M.A.C. and giving them a regulatory role?

**From:** [Thomas Steinbis](#)  
**To:** [Brown, Marlon \(LARA\)](#)  
**Cc:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** Re: Rep Shannon Letter Regarding Pending rule set #: 2019-84 LR Board of Chiropractic – General Rules Rule numbers: R 338.12001 R 338.12054  
**Date:** Tuesday, January 19, 2021 11:25:04 AM  
**Attachments:** [image002.png](#)  
[Shannon\\_ChiroLetterresponse.pdf](#)

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Thank you,

Please see Rep. Shannon's Response for the Public Comment section of the Meeting

Thank you,

Thomas Steinbis  
Office of Rep. Nate Shannon  
Legislative Director  
517-373-2275

---

**From:** Brown, Marlon (LARA) <brownm55@michigan.gov>  
**Sent:** Friday, January 15, 2021 6:57 AM  
**To:** Thomas Steinbis <TSteinbis@house.mi.gov>  
**Cc:** Nate Shannon <NShannon@house.mi.gov>; Pendleton, Courtney (LARA) <pendletonc@michigan.gov>; Gagliardi, Debra (LARA) <GagliardiD1@michigan.gov>; Przybylo, Kerry (LARA) <PrzybyloK@michigan.gov>; MacIntosh, Weston (LARA) <MacintoshW1@michigan.gov>  
**Subject:** RE: Rep Shannon Letter Regarding Pending rule set #: 2019-84 LR Board of Chiropractic – General Rules Rule numbers: R 338.12001 R 338.12054

Mr. Steinbis,

Attached is a letter from our department in response to Rep. Shannon's January 6th correspondence regarding Rule Set 2019-84 (Board of Chiropractic – General Rules). Please let us know if you require anything further at this time.

Sincerely,

-Marlon

**Marlon I. Brown**

Director | Office of Policy and Legislative Affairs

Michigan Department of Licensing and Regulatory Affairs

Office: 517.241.4580

Cell: 517.285.9446

Email: [brownm55@michigan.gov](mailto:brownm55@michigan.gov)



LET'S STAY SAFE TOGETHER

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**From:** Thomas Steinbis <[TSteinbis@house.mi.gov](mailto:TSteinbis@house.mi.gov)>

**Sent:** Thursday, January 7, 2021 2:34 PM

**To:** MacIntosh, Weston (LARA) <[MacintoshW1@michigan.gov](mailto:MacintoshW1@michigan.gov)>

**Cc:** Nate Shannon <[NShannon@house.mi.gov](mailto:NShannon@house.mi.gov)>; Triemstra, Marnie (LARA) <[TriemstraM1@michigan.gov](mailto:TriemstraM1@michigan.gov)>

**Subject:** Rep Shannon Letter Regarding Pending rule set #: 2019-84 LR Board of Chiropractic – General Rules Rule numbers: R 338.12001 R 338.12054

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Wes,

Please see attached letter from Rep. Nate Shannon. He has questions regarding upcoming rule changes in public comment with the Board of Chiropractic.

Thank you,

Thomas Steinbis  
Office of Rep. Nate Shannon  
Legislative Director  
517-373-2275



25TH DISTRICT  
STATE CAPITOL  
P.O. BOX 30014  
LANSING, MI 48909-7514

MICHIGAN HOUSE OF REPRESENTATIVES

**NATE SHANNON**

STATE REPRESENTATIVE

PHONE: (517) 373-2275  
FAX: (517) 373-5910  
NateShannon@house.mi.gov

Michigan Board of Chiropractic  
Wes MacIntosh, Board Analyst

1/19/2021

To the Michigan Board of Chiropractic,

Thank you so much for providing replies to my letter inquiring about the proposed Chiropractic rules changes. I have read your replies and submit the following insights.

You stated that the Chiropractic Board could re-evaluate the proposed engagement of the Michigan Association of Chiropractors (MAC) at a future date in the event MAC were unfair in their review of continuing education (CE.) I am aware that any change to Administrative Rules requires a lengthy and involved process. To avoid this, I suggest that the Board of Chiropractic keep the current CE application process in any new rules concurrent with any other selected review entity. This would offer an opportunity for any entity unfairly denied approval to submit to the Board directly as an option. Removing the current application process would eliminate this option. Utilizing MAC as the primary overseer without a concurrent option is questionable. The Chiropractic Board should keep alternative options available as a counterbalance. A full listing of approved CE programs should also continue to be posted to the website of the Board of Chiropractic.

The Board of Chiropractic establishes the precise rules for licensed Chiropractors. This would remain the case even if PACE, Providers of Approved Continuing Education, handled the review of CE courses in Michigan. PACE remains a fair, neutral option for the Board in solving its administrative overload. I remain concerned that MAC holds a conflicting interest as they do provide CE programs which may compete with other entities programs. In reference to the approved Chiropractic colleges automatic approval, I fail to see the need to distinguish between the location of the course being presented. We have recently observed Michigan's schools and universities successfully turn to online programs as an equivalent alternative to live and in-person instruction. The location of instruction should not be an issue. College programs may be automatically approved, whether offered on or off-campus.

In service to my constituency, I hope you will add my input above to the dialogue as you review these Administrative Rules.

Thank you for your consideration.

Sincerely,

Nate Shannon  
State Representative  
House District 25

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Opposing Board of Chiropractic CE Changes  
**Date:** Wednesday, January 13, 2021 9:53:19 AM

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-----Original Message-----

From: Dr. Shoe <[drshoe@clairpointe.com](mailto:drshoe@clairpointe.com)>  
Sent: Wednesday, January 13, 2021 8:41 AM  
To: BPL-BoardSupport <[BPL-BoardSupport@michigan.gov](mailto:BPL-BoardSupport@michigan.gov)>  
Subject: Opposing Board of Chiropractic CE Changes

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To: The Policy Analyst of the State of Michigan and the Board of Chiropractic  
From: Gary A. Shoemaker DC

I have been licensed in the State of Michigan since 1981, continue to practice full time, and have been a member of the Michigan Association of Chiropractors (M.A.C.) and it's predecessors for many years. I oppose the considered action by the Board of Chiropractic to grant the status of sole arbiter of continuing education courses to the M.A.C. or any other professional organization. I enjoy the flexibility offered by the Board to obtain my CE credits from multiple sources and fear that could change to the detriment of Michigan's chiropractors. The M.A.C. has offered quality courses in the past and I am sure will continue to do so. But my concern lies in the obvious conflict of interest that allowing a professional organization the power to determine what other groups may provide.

An example of this potential conflict happened last November, just weeks before the license renewal deadline, when the M.A.C sent out conflicting statements a week apart, that created confusion about which courses were approved as "live" and which were only considered to be "online". If the M.A.C. were to hold domain over these decisions, I would expect that our choices would only become more limited. I enjoy the courses put on by the Macomb County Chiropractic Association as well as Sherman College and do not feel that it is in the best interest of the public and the chiropractors of Michigan to allow the M.A.C to obtain this power. In addition, I oppose the requirement that CE courses offered by accredited chiropractic colleges may only be done in person. This change will only serve to increase the costs to the individual chiropractor to maintain their licensure.

Respectfully,

Gary A. Shoemaker DC  
Clairpointe Family Chiropractic  
Grosse Pointe Farms, Michigan

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Rule Under Consideration To Give M.A.C. Sole Authority Over Continuing Education.  
**Date:** Tuesday, January 19, 2021 12:19:40 PM

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**From:** Craig Stephenson <craigstephenson49@yahoo.com>  
**Sent:** Tuesday, January 19, 2021 12:15 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Rule Under Consideration To Give M.A.C. Sole Authority Over Continuing Education.

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I'm Against It! It's Like Fighting To Be Captain Of The Titanic With The Iceberg Approaching! You Need To Act As Brothers Of Us All. I've Attended Seminars Of Many-Including Yours. They Were All Good. Lately I've Been Attending Macomb County Chiropractic Association's Educational Seminars. They Are Great - Close - Reasonable - And I Can Return Home At Night For My Old Dogs! Hell--I'm Getting Old Too!! Traveling Across The State Does Not Work For Me. Do Something Good For Us All. Focus On Insurance Equality. Focus On Getting Our Own Chiropractic Doctor Over Us At HHS. Medicare. Presently - It's Like The Klu Klux Klan In Charge Over African American Affairs! It's NOT About Health Care! It's Discrimination Of The Safest Most Natural Health Care In The WORLD!! FINALLY -- Which Should Have Been FIRST - Focus On Patients Right To Choose Where They Go For Care Without Network Prisons. We Are Americans! Our Rights To Choose Our Dr. - Our Care - Have Been Stolen By Kings -Queens- And Network FEEF DUMBS -All Demanding-Veers Your Papers! It's NOT AMERICAN! One Law-One Rule-Could Return All Our Freedom Of Health Care! MANDATE That Patients Can Choose Who-Ever They Want To Go To OUTSIDE Of Networks ---AND Insurance Will Have To Pay Same As In Network Minus Ten Percent. No Different Set Of Rules For NON Network DR"S. Then It's Up To The Dr. To Accept It As Payment In Full. THIS CURRENT SYSTEM HAS DESTROYED THE FAMILY DR!!!! NO Dr. Should Have To Join 2000 Or More Medical Plans Just To Be Able To See The Pt. And GET PAID!!! I'm Old Enough To Remember The American Way-BEFORE They Decided To Fix It And Make It Better. NOW It's 4 Times The Cost! -- AND People Don't Have A Choice! FIX THAT!! - And A Lot Of Wonderful Dr.s Could Go Back To Work Doing What They Do Best! Our Medical Brothers Would Even Like That Idea. I Love You All! I'm Praying For You! And I Thank God For You! Thank You Sincerely Craig Louis Stephenson D.C. Michigan # 2944

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic license renewal  
**Date:** Tuesday, January 12, 2021 7:28:08 AM

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**From:** Larry Sutherland <drspine81@hotmail.com>  
**Sent:** Tuesday, January 12, 2021 7:21 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic license renewal

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Dear Sir, I would like to express my concern regarding the state of affairs that is before the Chiropractic profession. First, I don't know of any circumstance where a "Monopoly" of any kind, is good. Omni Chiropractic Seminars have been providing excellent quality Education Seminars for many years, and should NOT BE excluded by a State Organization. It appears to me they have an agenda of their own, and are trying to FORCE their agenda on others. Please, this is not right in any way, shape, or manner, and I would hope you would consider this as this situation becomes more apparent in upcoming days.

Sincerely yours  
Dr. Larry Sutherland

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: continuing education approval proposal  
**Date:** Monday, January 18, 2021 2:29:22 PM

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**From:** drsteve107@aol.com <drsteve107@aol.com>  
**Sent:** Thursday, January 14, 2021 7:26 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** continuing education approval proposal

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Policy Analyst of the State of Michigan and the Board of Chiropractic:

My name is Dr. Stephen A. Thompson. I have been licensed in the state of Michigan since 1975. I also have held licenses in the states of Florida and Colorado.

I would like to address the current subject regarding the MAC and the Board of Chiropractic. It is my understanding that the MAC, our professional trade association, would like to have the final say in what continuing education classes are approved in Michigan versus the professional licensing board which include both lay persons and doctors of chiropractic who have been appointed by the governor.

It seems to me that this would result in a reduction in the variety and quality of approved available classes. It also seems obvious that this creates a certain bias in favor of the MAC as well as a financial incentive for them to offer only their approved classes. This is not good for the profession/doctors. There is definitely a need for oversight.

Currently, there exists other alternatives which are utilized throughout the United States. There are professional, independent provider organizations such as "Providers of Approved Continuing Education" (PACE) that should be utilized in Michigan, as is done in the majority of states. These types of organizations are independent and unbiased and only have the doctors' best interests in mind. There is no additional need for oversight. Their only goal is to promote a variety of high quality continuing education classes.

At this time, as I read through the proposal, only "on campus" continuing education classes are guaranteed to be approved. In this time of a worldwide pandemic, travel is not a good option, considering that all chiropractic campuses are outside of Michigan. It is also time consuming and expensive. These same classes could be offered by the same instructors in more local and convenient locations in state. It should not matter where these classes are taught.

Another point that I wish to make is that I don't see how MAC members necessarily qualify as educators and should not be burdened making educational decisions that affect all other members.

As an authorized state licensing board, the Board of Chiropractic should continue to take on the responsibility of evaluating and approving continuing education requests.

As a viable alternative, these decisions could be delegated to an official, independent review organization such as PACE.

Thank you for these considerations.

Sincerely,

Dr. Stephen A. Thompson,DC

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: CE courses  
**Date:** Wednesday, January 13, 2021 7:04:02 AM

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**From:** Jaime Vande Veegaete <jlv\_dc@yahoo.com>  
**Sent:** Tuesday, January 12, 2021 7:38 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** CE courses

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To Whom it may concern,

I am writing this letter in response to the proposed change to let a trade organization approve our CE courses. This is a clear conflict of interest. It would be in their benefit to limit outside courses. It also limits the array of topics of which we can take courses on. It has become increasingly more difficult to find seminars to take that will fulfill all of the special hour requirements and I find myself taking courses just to do that, even if it's a topic I may not be particularly interested in. By letting a trade organization take over the approval, we will have less to choose from and less dates to get take them. Already many outside programs that I really enjoyed are not coming to Michigan due to not getting approval. This will only get worse. If we are required to fulfill these CE requirements, we should be given every opportunity to take them from an array of programs, instructors, topics, and dates to complete them. Please do not turn over approval to a trade organization. Thank you for your time.

Sincerely,

Dr. Jaime Vande Veegaete, DC

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic College CE courses  
**Date:** Tuesday, January 12, 2021 1:42:53 PM

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**From:** Arthur VanHoutteghem <drvan1983@yahoo.com>  
**Sent:** Tuesday, January 12, 2021 1:37 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic College CE courses

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Name: Arthur VanHoutteghem DC Email Address:

[drvan1983@yahoo.com](mailto:drvan1983@yahoo.com)

---

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Continuing Education  
**Date:** Wednesday, January 13, 2021 7:03:34 AM

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**From:** william vecchioni <drwvecchioni@gmail.com>  
**Sent:** Tuesday, January 12, 2021 4:55 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Continuing Education

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To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. Monopolies never work. I like to see diversity in course offerings as I have enjoyed for the past 39 years in practice.

Sincerely,

William D. Vecchioni, D.C.

4218 Pelham Rd.

Dearborn Hgts., Mi 48125

313 277-1100

license #4654

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Chiropractic Continuing Education Courses Proposal  
**Date:** Monday, January 18, 2021 2:47:48 PM

---

**From:** Weiss Chiropractic Life Center <weisschirolc@gmail.com>  
**Sent:** Monday, January 18, 2021 11:15 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Chiropractic Continuing Education Courses Proposal

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To Whom It May Concern:

I am highly against the state turning the continuing education credits certification over to The Michigan Association of Chiropractors (MAC). This provides the MAC the opportunity to become a monopoly for continuing education courses for Chiropractors in Michigan. This proposal will seriously dilute the options and standards of courses. The MAC will have absolute freedom to charge doctors whatever price they want to take their courses and choose not to allow other continuing education competitors the authorization for CE courses. Not only does the MAC charge for continuing education courses, but they charge a membership fee to the Chiropractors as well. It is absolutely ludicrous that this is even in consideration right now. Please reject this proposal to keep the standards and integrity of the chiropractic licensing process high.

I am very sad that I will not be able to attend the zoom meeting tomorrow and would greatly appreciate you reading the above statement to the board members.

--

Dr. Lawrence R. Weiss

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**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: Proposed MAC takeover of CEUs  
**Date:** Monday, January 18, 2021 2:41:32 PM

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**From:** Stephanie Witte <drstephaniewitte@gmail.com>  
**Sent:** Monday, January 18, 2021 8:10 AM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** Proposed MAC takeover of CEUs

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Dear Analysts,

It is my greatest hope that you do NOT allow the MAC to be the only regulatory agency for chiropractic continuing education.

The MAC is great in many ways in advancing our profession in lobbying and uniting us, but as a practicing chiropractor, I know there is a huge disparity between MAC offered courses and courses offered by Omni, Fetterman, Macomb and even WiseDC.

I have taken many different continuing education units over my 11 years in practice, I take one MAC seminar every two year period. Why, you may ask? Because I like to hear the seminars on insurance updates and changes for Michigan, but the biggest reasons are cost of the seminars and self promotion on the part of most speakers. I am not a member of the MAC because as an associate doctor I could not afford the membership fees and now as a new business owner in the throes of covid19, its even worse. Additionally, if you are not a member of the MAC, then the cost per seminar is higher. This lead me to seek my continuing education from other companies because I could only afford one MAC seminar every two years.

My other major concern with MAC only events is content. I have sought CEUs elsewhere because I detest being advertised to in the middle of my learning. Every time a presenter tells me their tape or their tool or their way is the best, and to visit their booth on a break, makes them lose all credibility to me because it becomes a sales pitch at that point; and I deal with that day in and day out with telemarketers in my office. MAC seminars are full of people doing self promotion. I understand the need to advertise to keep seminar costs lower, but please keep it out of the seminar. I have sat through dozens of other seminars by other companies that do not advertise at all. To me, they are much more fun, credible and applicable to my practice.

Having the MAC in charge of CEUs solely would cause a conflict of interest and be of detriment for those of us who choose to seek our credits elsewhere. I enjoy having different companies to chose my continuing education from. The MAC has wonderful philosophical speakers; Fetterman has

renowned radiological speakers, WiseDC has online seminars that are convenient and applicable such as nutrition in a clinical setting. Having our MAC regulate CEUs would be unfair to these other companies because it has the potential for abuse of power since they are all in competition with one another. For example, it could lead to the MAC denying these other companies their courses or forcing these companies to merge with them, leading to no variety in education anymore. The MAC is wonderful in many ways and I am in no way denouncing it as an entity to push change for chiropractic, but if the MAC becomes the regulatory agency of our continuing eds, then it could lead to other issues down the road. Please, when making a decision, keep these points I've made in mind, and if you don't agree with some of my points, then please keep this in mind. If you determine that the MAC can regulate seminars, then take out the conflict of interest please, and determine that the MAC not hold seminars so they can be an impartial regulatory body. If you agree they should not be the regulatory agency it would be wonderful because I do enjoy having choices and the MAC is another great seminar option.

In summation, variety is the spice of life and having the MAC regulate our CEUs could lead to potential abuse of power and potential elimination of chiropractic continuing education choices. Please consider to continue to allow PACE to determine chiropractic education in continuing eds.

Thank you for your time!

Very Sincerely,

Stephanie M. Witte-Mason, DC

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: public hearing on chiropractic rules January 19, 2021  
**Date:** Tuesday, January 19, 2021 3:35:30 PM

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**From:** rjwoolman@aol.com <rjwoolman@aol.com>  
**Sent:** Tuesday, January 19, 2021 3:04 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** public hearing on chiropractic rules January 19, 2021

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To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education. The Board should maintain the distinction between a membership-based professional trade association, the M.A.C., as opposed to a governmental regulatory body. There is a potential conflict of interest as the M.A.C. offers Continuing Education (C.E.) courses and may view other C.E. providers as competitors. There are no 'checks and balances' over the authority being offered to the M.A.C.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

M.A.C. should **not** be granted automatic C.E. approval. All C.E. provider organizations should apply and be reviewed by the state Board or by P.A.C.E. There must be independent oversight. Why should M.A.C. be 'above the rules?' If the M.A.C. is automatically approved, the M.C.C.A. (Macomb County Chiropractic Association) should also be automatically approved for their annual C.E. seminar.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus **OR** Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please re-think the process and open up the options to Michigan Chiropractors to

better serve the citizens of our state through broader and more diverse course offerings without a conflict of interest. **The state Board's role is to protect the public, not to protect the M.A.C. Fairness should prevail.** Thank you very much.

Sincerely,

Richard Woolman, D.C.

[rjwoolman@aol.com](mailto:rjwoolman@aol.com)

**From:** [BPL-BoardSupport](#)  
**To:** [MacIntosh, Weston \(LARA\)](#)  
**Subject:** FW: MI Board of Chiropractic Rule Change objection  
**Date:** Monday, January 18, 2021 2:18:43 PM

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**From:** Kim Zell <kmzdc@yahoo.com>  
**Sent:** Wednesday, January 13, 2021 10:08 PM  
**To:** BPL-BoardSupport <BPL-BoardSupport@michigan.gov>  
**Subject:** MI Board of Chiropractic Rule Change objection

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To the Policy Analyst of the State of Michigan and the Board of Chiropractic:

I am writing to oppose the rule under consideration which would give the Michigan Association of Chiropractors (M.A.C.) sole authority over Continuing Education program approval. This group should not be handed control of this process. A similar strategy was attempted years ago by the previous association, the Michigan Chiropractic Society (MCS). The proposal was rejected then as it should be now.

There are other more fair and reasonable options that should be acceptable to the Board: The majority of state Boards in this country utilize P.A.C.E. (Providers of Approved Continuing Education) of the F.C.L.B. (Federation of Chiropractic Licensing Boards.) P.A.C.E. offers a rigorous established review process for C.E. provider organizations.

Chiropractic College C.E. courses should be automatically approved whether classes are offered On-campus *OR* Off-campus. The pandemic has shown us that educational diversity is valid and useful. There is no reason that an identical course should only be approved On-campus, forcing Michigan's Chiropractors to travel at added risk and expense. This would only serve the M.A.C.

Please restore the process by opening up options for CEU programs offered to Michigan Chiropractors, so as to better serve the citizens of our state through broader and more diverse course offerings avoiding potential conflict of interest. The state Board's role is to protect the public, not to protect the M.A.C.

Thank you.

Sincerely,

Kim M. Zell, D.C.

[kmzdc@yahoo.com](mailto:kmzdc@yahoo.com)

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