

Archived: Wednesday, March 20, 2024 10:37:56 AM

From: [BPL-BoardSupport](#)

Sent: Tue, 27 Feb 2024 16:48:03

To: [MacIntosh, Weston \(LARA\)](#)

Subject: FW: Chiropractic Rule Comments

Importance: Normal

Sensitivity: None

From: Martha O'Connor <marthaoconnor411@gmail.com>

Sent: Tuesday, February 27, 2024 11:30 AM

To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>

Subject: Chiropractic Rule Comments

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Dear Bureau of Professional Licensing:

I have reviewed the proposed changes to the Chiropractic – General Rules and have the following comments related to satisfying continuing education requirements for both relicensure and renewal of a license.

Under R 338.12036(1)(c)(ii), it says “Not more than 15 continuing education hours in distance learning programs.” This limitation on the use of distance learning programs for satisfying continuing education requirements is overly burdensome and unnecessary for relicensure applicants, requiring the expenditure of extra money, time, and travel, and is unlike the continuing education requirements for most other professions. The Department should strike this requirement and remove it from the rules. The removal of this requirement would accordingly move the content of R 338.12036(1)(c)(i), with proper editing, to R 338.12036(1)(c).

Under R 338.12036(2)(d)(i)(C), it says “Not more than 15 continuing education hours in distance learning programs.” This limitation on the use of distance learning programs for satisfying continuing education requirements is overly burdensome and unnecessary for relicensure applicants, requiring the expenditure of extra money, time, and travel, and is unlike the continuing education requirements for most other professions. The Department should strike this requirement and remove it from the rules.

Under R 338.12041(1)(b), it says “Not less than 15 hours of continuing education must be completed by attending a live, in-person program.” This live, in-person requirement for satisfying continuing education requirements is overly burdensome and unnecessary for license renewals, requiring the expenditure of extra money, time, and travel, and is unlike the continuing education requirements for most other professions. The Department should strike this requirement and remove it from the rules.

Under R 338.12041(2)(a), it says, “Attendance at or participation in a continuing education program or activity related to the practice of chiropractic, or any non-clinical subject relevant to the practice of chiropractic education, administration, management, or science, which includes, but is not limited to, live in-person programs, interactive or monitored teleconferences, audio-conferences, web-based programs, online programs, and review of journal articles or other self-study programs approved or offered by the Michigan Association of Chiropractors (MAC) according to the following:”. This provision places the MAC at an unfair, competitive advantage over other providers of continuing education both inside and outside this state and is overly burdensome to licensees, especially licensees found outside this state. Approximately 75% of states throughout the country currently recognize Providers of Approved Continuing Education (PACE) of the Federation of

Chiropractic Licensing Boards (FCLB) as ensuring quality chiropractic continuing education programs. For this reason, PACE should be included under R 338.12041(2)(a), and the Department should revise the provision to say the following:
“Attendance at or participation in a continuing education program or activity related to the practice of chiropractic, or any non-clinical subject relevant to the practice of chiropractic education, administration, management, or science, which includes, but is not limited to, live in-person programs, interactive or monitored teleconferences, audio-conferences, web-based programs, online programs, and review of journal articles or other self-study programs approved or offered by the Michigan Association of Chiropractors (MAC) or Providers of Approved Continuing Education (PACE) according to the following:”

I strongly encourage these changes to align the continuing education requirements with other health professions, update them to allow licensees to take advantage of available technology by allowing more distance education hours, and to give licensees a broader selection of quality continuing education programs.

Sincerely,
Martha O'Connor