



**From:** [Montgomery, Cynthia](#)  
**To:** [Wolfgang, Jacqueline](#); [Farrell, Marc](#); [Reichard, Jo \(GC\)](#)  
**Subject:** FW: [External] PCA letter to State Board of Chiro re: CE fee increases  
**Date:** Monday, August 21, 2023 10:43:19 AM  
**Attachments:** [image001.png](#)  
[State Board Chiro CE Fee Increases FINAL 8.18.23.docx](#)  
[image002.png](#)

FYI.

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 (preferred pronouns: she, her, hers)

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**From:** Claggett, Arion <arclaggett@pa.gov>  
**Sent:** Monday, August 21, 2023 10:04 AM  
**To:** Miley, Tyesha <tmiley@pa.gov>; Chappelle, Shakeena <schappelle@pa.gov>; Richards, Amanda (DOS) <arichards@pa.gov>  
**Cc:** Townley, Christina <ctownley@pa.gov>; Montgomery, Cynthia <cymontgome@pa.gov>; Mattis, Kimberly <kmattis@pa.gov>  
**Subject:** FW: [External] PCA letter to State Board of Chiro re: CE fee increases

FYI



**Arion R. Claggett** | Acting Commissioner  
 Bureau of Professional & Occupational Affairs  
 2601 N Third St, Harrisburg, PA 17110  
 Office: 717-346-1590 | Cell: 717-319-4445  
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**From:** Claggett, Arion  
**Sent:** Monday, August 21, 2023 10:02 AM  
**To:** Edward Nielsen <[enielsen@pennchiro.org](mailto:enielsen@pennchiro.org)>; Aukerman, William <[waukerman@pa.gov](mailto:waukerman@pa.gov)>

**Cc:** Keith Miller <[zenak3@gmail.com](mailto:zenak3@gmail.com)>; Andrew "Drew" Heck <[andrewheck94@gmail.com](mailto:andrewheck94@gmail.com)>; Dan Schatzberg <[danschatzy@gmail.com](mailto:danschatzy@gmail.com)>; Chris Young <[dr.chris@1800painteam.com](mailto:dr.chris@1800painteam.com)>; Jeff Snyder <[drjsnyder@gmail.com](mailto:drjsnyder@gmail.com)>; Jason Martin <[jbmartin@jbmartinlaw.com](mailto:jbmartin@jbmartinlaw.com)>

**Subject:** RE: [External] PCA letter to State Board of Chiro re: CE fee increases

Hello Mr. Nielson,

Your comments have been shared with board counsel and BFO.

We will follow-up.

Thank you



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**From:** Edward Nielsen <[enielsen@pennchiro.org](mailto:enielsen@pennchiro.org)>

**Sent:** Monday, August 21, 2023 9:45 AM

**To:** Claggett, Arion <[arclaggett@pa.gov](mailto:arclaggett@pa.gov)>; Aukerman, William <[waukerman@pa.gov](mailto:waukerman@pa.gov)>

**Cc:** Keith Miller <[zenak3@gmail.com](mailto:zenak3@gmail.com)>; Andrew "Drew" Heck <[andrewheck94@gmail.com](mailto:andrewheck94@gmail.com)>; Dan Schatzberg <[danschatzy@gmail.com](mailto:danschatzy@gmail.com)>; Chris Young <[dr.chris@1800painteam.com](mailto:dr.chris@1800painteam.com)>; Jeff Snyder <[drjsnyder@gmail.com](mailto:drjsnyder@gmail.com)>; Jason Martin <[jbmartin@jbmartinlaw.com](mailto:jbmartin@jbmartinlaw.com)>

**Subject:** [External] PCA letter to State Board of Chiro re: CE fee increases

**Importance:** High

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Commissioner Claggett & Chair Aukerman-

Attached is PCA's initial and constructive response to the draft presented at the August 10 meeting of the PA State Board of Chiropractic, specifically regarding continuing education fee increases for PA-licensed DCs.

PCA stands ready to further discuss the proposal and our comments at your convenience. Thank you for considering and responding to PCA's recommendations.

Respectfully,

*Ed*

Edward L. Nielsen, MHS  
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*“We cannot solve problems with the kind of thinking we employed when we came up with them.”- Albert Einstein*

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August 18, 2023

**ATTN:** BPOA Commissioner Claggett, State Board of Chiropractic Chair Dr. Aukerman and Board Counsel:

**RE:** "Regulation No. 16A-4335 (Fees)"

The PCA has reviewed the "Proposed Rulemaking" regarding fees and would like to extend a comment. We understand that each year, the Board receives approximately 600 applications for approval of continuing education courses / CEs (or about 1,200 each biennium). The graduated increases for this fee will generate the proposed revenue as follows:

- Fiscal Year 2024-2025 through Fiscal Year 2025-2026: The fee increase from \$30 to \$100 will generate an additional \$84,000 in fees.
- Fiscal year 2026-2027 through Fiscal Year 2027-2028: The fee increase from \$100 to \$110 will generate an additional \$12,000 in fees.
- Fiscal Year 2028-2029 through Fiscal Year 2029-2030: The fee increase from \$110 to \$120 will generate an additional \$12,000 in fees.

We respect the BFO's projections as well as the graduated projections regarding Fiscal Year; however the PCA suggests that the fee increase be reflected in a **tiered manner specific to "per credit" ranges as opposed to per course**. PCA recommends the following tiered fee schedule for the 2024-2026 Fiscal years:

- Courses seeking approval of 0-2 CE: \$45
- Courses seeking approval of > 2-6 CE: \$75
- Courses seeking approval of > 6+ CE: \$125

**PCA's proposed fees are proportional to cost absorption.** Many doctors are choosing to learn a variety of topics online at 1 to 2 credits per topic expanding their knowledge base as a provider. This new fee schedule will significantly reduce the number of these programs, or exponentially increase their prices to license holders.

PCA and our members also believe that the 90 days lead time to approve CE is far too long; far longer than other state board approval times. With the significant increase in fees, we believe it's reasonable and appropriate to cut approval times down to under 60 days, preferably under 45 days. Members have reported to the PCA that board approval delays have meant that PA doctors were unable to attend recent national conferences due to lack of PA CE approval.

PCA welcomes a dialogue with the State Board and BPOA regarding our recommendations regarding future fee increases and policy changes regarding chiropractic continuing education.

PCA assumes that all PA health professions' licensing boards have been advised of similar proposals as they impact each state licensing board and educational programs.

PCA stands ready to further discuss with you our rationale for a **Tiering Structure** and reducing approval times for CEs approved by the State Board of Chiropractic.

Respectfully,

A handwritten signature in black ink that reads "Keith M. Miller, DC".

Keith M. Miller, DC  
PCA President, 2022- 2024