

6/27/24

To: Chiropractic Board of Examiners
Re: Public Hearing Clearinghouse Rule 24-046 Chir 12

The Chiropractic Society of Wisconsin (CSW) appreciates the Board's efforts to modify the nutritional consulting rule.

We are in support of the majority of the proposed modifications currently being considered.

We would like to suggest the following additional modifications be considered by the Board for inclusion in the final document:

1. Section 6: Include the removal of 12.03(2)(a)(3).
 - a. The initial rule was drafted by simply taking the existing CE application process language and inserting it into the Certification application. 20 years ago, the majority of the DC's taking the certification were existing DCs and allowing for CE to be included made sense. At the time the suggestion was made to have a certification application and a separate CE application. That recommendation was rejected by a slight majority of the Board and the rules were created to mirror CE applications.
 - b. A certification program is different than a CE program. They are given several times a year primarily when the new DCs are graduating from college. The new DCs do not need CE and thus the requirements for CE are not necessary. A program sponsor could separately apply for CE, but it should not be a requirement for certification.
 - c. Modifying the rules to remove the CE language was the initial purpose of this current rulemaking process.
 - d. 12.03(2)(a)(3) is unnecessary for a certification course and is designed primarily for CE which would require a specific date and time for the CE to be delivered. The need for a date and time on the application for nutritional certification is not necessary especially when there will be several dates of delivery for the program over the biennium and the inclusion of online educational options would make it unfunctional when submitting applications.
 - e. The primary concerns for the Board related to a nutritional certification are the program sponsors, the course content and the quality of the presenters.
2. Modification to 12.03 (2)(a)(4)
 - a. The current recommendation is to reduce the filing for a nutritional certification from 75 to 60 days. The CSW is requesting the Board remove the application timeline from 75 to zero. The current CT/CRT rules for a certification process due

not have an application time delay before the course may be provided. We are simply requesting the nutritional certification process mirror the successful CT certification process and remove language that mirrors the CE application process.

- b. This current modification in the draft rule simply mirrors the current CE application filing timeline which changed from 75 to 60. We understand the need for the 60-day requirement for CE as there are hundreds of applications and each one is different. However, there is no need for any days prior to filing for a certification program as the requirements for the program are identified in the rules. The approval process is a simple review to confirm the sponsor, program content and quality of the presenter.
 - c. As noted in the request to remove the date and time, the filing deadline is also unnecessary for a certification program. The program should be allowed to be submitted with the only time delay being the actual time it takes for the Board to approve and place on the website for notification.
3. Section 10: Remove 12.04 (4)
 - a. We agree with the removal of 12.04 (2) and (3). The language in 12.04 (4) also mirrors the CE requirements and is not necessary for a nutritional certification program. During a 48-hour nutritional program, questions related to specific nutrients will be asked and we would like to preempt any potential issues that this specific paragraph language may involve.
 4. Section 11: Chir 12.05(1)
 - a. We are requesting clarification on the language found in this paragraph to determine if it is actually necessary. The language currently mirrors CE language and is not found in the CT certification program. Examples of what financial or personal conflict by the sponsor for providing the program would include would be helpful.
 - b. We believe the language is associated with CE and could easily be removed, but simply ask for clarification.

Submitted by:


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