

**STATE OF ALASKA
DEPARTMENT OF COMMERCE, COMMUNITY AND
ECONOMIC DEVELOPMENT
DIVISION OF CORPORATIONS, BUSINESS AND PROFESSIONAL LICENSING**

**ALASKA STATE BOARD
OF CHIROPRACTIC EXAMINERS**

**MINUTES OF MEETING
February 26, 2010**

By authority of AS 08.01.070(2) and in compliance with the provisions of AS 44.62, Article 6, a scheduled meeting of the Alaska State Board of Chiropractic Examiners was held on February 26, 2010 in Juneau, Alaska.

Call to Order/Roll Call

The meeting was called to order by Dr. David Mulholland, President at 9:07 a.m. Those present, constituting a quorum of the Board were:

David Mulholland, DC, President
Rosemary Zimmerman, DC, Vice-President
James Heston, DC, Secretary
Daniel Holt, DC
Jeff Garness, Public member

In attendance from the Department of Commerce, Community and Economic Development, Division of Corporations, Business and Professional Licensing:

Debora Stovern, Licensing Examiner – Juneau

Agenda Item 1 – Review Agenda

The Board reviewed the tentative meeting agenda and determined to add an election of officers to Agenda Item 4 Board Business.

Upon a motion duly made by Dr. Zimmerman, seconded by Dr. Holt and approved unanimously, it was:

RESOLVED to approve the agenda, as amended.

Agenda Item 2 – Review Meeting Minutes

The Board reviewed the minutes of the September 11, 2009 meeting. A correction was noted under Agenda Item 12 – Chiropractic in Alaska University System, to reflect the discussion regarding preceptor/internship programs, as well as pre-med type courses.

Upon a motion duly made by Dr. Zimmerman, seconded by Dr. Heston, and approved unanimously, it was:

RESOLVED to approve the minutes of the September 11, 2009 meeting, as amended.

Dr. Mulholland noted that the minutes are an important tool used by Legislative Audit when reviewing Board activity during the sunset audit process.

Agenda Item 3 – Board Business

Ratification of New Licensees

Upon a motion duly made by Dr. Zimmerman, seconded by Dr. Heston and approved unanimously, it was:

RESOLVED to ratify the licenses issued to Benjamin J. Pontius #499, Bradley D. Mangum #500, Shawn D. Lovdahl #501, Jaime R. Dequine #502, Konstantine E. Bunde #503, Kelly L. Cox #504, Tyler L. Adams #505, and Weston L. Hopkins #506.

Ethics Reporting

There were no ethics conflicts to report.

Ms. Stovern distributed a pamphlet “Ethics Act Procedures for Boards and Commissions” published on the website for the Governor’s Office Boards and Commissions. The Board directed Ms. Stovern to provide members the link for that website, as well as the Department of Law Executive Branch Ethics website where the ethics video may be downloaded. Ms. Stovern noted that their website contains a lot of valuable information regarding ethics, including the ethics video, a power-point presentation for self-guided ethics training, disclosure forms, frequently asked questions, and the statutes and regulations covering the Alaska Executive Branch Ethics Act.

The terms for Dr. Mulholland and Mr. Garness are both expiring and the Governor’s Office has appointed Dr. Walter J. Campbell and Verdie A. Bowen, Sr. to their seats, effective March 1, 2010.

The Board determined to view the ethics video at the next meeting, as an update to current members and an introduction to new members.

Agenda Item 4 – Investigative Report

Investigator JoAnna Williamson joined the meeting by teleconference to review the investigative report she had provided to the Board. She reported that there is one open complaint, on open investigation, and five complaints closed since the last Board meeting.

Upon a motion duly made by Dr. Zimmerman, seconded by Dr. Heston, and approved unanimously, it was:

RESOLVED to enter into executive session in accordance with AS 44.62.310(c)(2) and (3), and Alaska Constitutional Rights to Privacy Provisions for the purpose of discussing the investigative report.

The Board entered executive session at 11:47 a.m.
The Board went back on the record at 12:07 p.m.

Upon a motion duly made by Dr. Zimmerman, seconded by Dr. Holt, and approved unanimously, it was:

RESOLVED to adopt the Consent Agreement for case #700-00-001.

Agenda Item 5 – Discuss Scope of Practice

Gayle Horetski, Assistant Attorney General with the Department of Law, joined the meeting to discuss the scope of practice for chiropractic physicians in the State of Alaska and provide guidance regarding the injectable nutrient issue.

At the recent meeting of the Alaska State Board of Chiropractic Examiners, there was discussion of a program being offered in Alaska teaching the utilization of injectable nutrients. Board members and staff have received a number of inquiries regarding this procedure and this class, and the Board had determined to send a letter to all licensees to clarify their position on this issue. They had also directed Ms. Stovern to ask for an opinion from the Department of Law regarding the definitions of “prescription drug” and “surgery” in the Chiropractic scope of practice.

Ms. Horetski provided background information regarding the Department of Law, as well as some history of the chiropractic profession in the State of Alaska. She reported that chiropractic physicians have been licensed since 1939 when Alaska was a territory.

Ms. Horetski noted that the definition of “prescription drug” may be found under the Pharmacy Board, Alaska Statute (AS) 08.80.480(30), as well as in federal law, which states that any injectable (except for insulin) requires a prescription. She noted that there is not a specific definition for surgery in Alaska law, although there are definitions in other sources. The Board’s position has been that piercing the skin for diagnostic purposes

is acceptable under the scope of practice, but that piercing the skin for therapeutic purposes is not acceptable. Ms. Horetski suggested that the Board consider a regulations project to define “prescription drug” and “surgery” as used in the Chiropractic scope of practice.

A draft letter prepared by Dr. Mulholland and Ms. Stovern was distributed for consideration. Ms. Horetski proposed some changes, including additional cites to Alaska Statutes and federal law, and noting that anyone violating the laws will face disciplinary action. The Board directed Ms. Stovern to finalize the edited letter and to distribute it to all licensees. A copy is also to be provided to the investigator, who may direct questions to Ms. Horetski.

The Board determined that they do not need to pursue a formal opinion from the Office of the Attorney General at this time.

Agenda Item 3 – Board Business (continued)

Review Goals and Objectives

The Board reviewed their goals and objectives for Fiscal Year 2010:

Goal 1: The Board will continue to carry out their assigned duties, as outlined in Objectives 1 through 7. They amended Objective 1 to read “Conduct a minimum of three Board meetings a year and to rotate the location of the meetings between different regions of the state. The amended Objective 3 to include developing guidance regarding criminal history record information. They amended Objective 7 to read “Make Board determinations and Position Statements, as appropriate, regarding issues affecting the safety of the public.”

Goal 2: The Board will continue to provide information regarding Board activities to the profession and the public, as outlined in Objectives 1 through 8. They amended Objective 7 to read “Support efforts to educate the public regarding the benefit of chiropractic care as a health care form.” They added Objective 9: “Ensure current information is available on the Board website through regular updates by staff and regular monitoring by Board members.”

Goal 3: The Board will continue their affiliation with the Alaska Chiropractic Society (ACS) to work cooperatively in the best interest of the profession and the public, as outlined in Objectives 1 through 3. Dr. Holt volunteered to serve as the Board liaison to the ACS to facilitate effective cooperation.

Upon a motion duly made by Dr. Zimmerman, seconded by Dr. Heston, and approved unanimously, it was:

RESOLVED to appoint Dr. Holt as the Board liaison to the Alaska Chiropractic Society.

Goal 4: The Board will continue to pursue statutory authority consistent with the practice of chiropractic to ensure the health and safety of the public, as outlined in Objectives 1 through 7. They noted that Objective 1 may be obsolete, and directed Ms. Stovern to research the history of this objective and whether there has been a correction of the conflicting licensure requirements between Workers Compensation statutes and Chiropractic statutes. They amended Objective 4 to read "Support the Alaska Chiropractic Society (ACS) regarding the subject of physical exams for school, sports activities, pre-employment, workplace fitness, impairment rating evaluations, FAA and DOT specialties, etc."

The Board reconfirmed their commitment to this goal and noted that the remaining objectives would be accomplished if the ACS is successful in securing the passage of a legislative project during the upcoming session.

Goal 5. The Board will continue to assess and evaluate regulations, as outlined in Objectives 1 through 5. They determined that Objective 4 (regarding continuing education credit for CPR, AED, and basic life support training) and Objective 5 (regarding criminal background checks) were now complete. They added a new Objective 4: "Develop regulations defining surgery and prescription drugs as used in the Chiropractic scope of practice." They added a new Objective 5: "Amend 12 AAC 16.430(a)(7) to remove the reference to *Fee Facts*, which no longer exists."

Goal 6. The Board will continue to work to establish a utilization review process through the Peer Review Committee, as outlined in Objectives 1 through 3.

Goal 7. The Board will continue affiliation with the Federation of Chiropractic Licensing Boards (FCLB), the National Board of Chiropractic Examiners (NBCE), the Association of Chiropractic Board Administrators (ACBA), and the Council on Chiropractic Education (CCE), as outlined in Objectives 1 through 4. They determined to include their affiliation with the Council on Licensure, Enforcement and Regulation (CLEAR) and the Federation of Associations of Regulatory Boards (FARB), and added Objective 5: "Promote attendance by Board members and staff at the annual CLEAR and/or FARB conferences."

Goal 8. The Board will continue to consider the sunset review process and to review and respond to sunset audit report recommendations. The next sunset review is scheduled for June 30, 2014.

Upon a motion duly made by Dr. Zimmerman, seconded by Mr. Garness, and approved unanimously, it was:

RESOLVED to amend the Goals and Objectives, as noted.

Election of Officers

The current Board president, Dr. Mulholland has a term expiring effective March 1, 2010; therefore the Board determined to elect new officers, in accordance with Alaska Statute (AS) 08.20.040. Dr. Mulholland nominated the following slate of officers:

- Dr. Zimmerman for the office of President
- Dr. Heston for the office of Vice-president
- Dr. Holt for the office of Secretary

Upon a motion duly made by Mr. Garness, seconded by Dr. Heston, and approved unanimously, it was:

RESOLVED to appoint the slate of officers as nominated.

Agenda Item 6 – Statute/Regulations Projects

Review recently adopted regulations

At their last meeting, the Board adopted regulation changes to 12AAC 16.290 Continuing Education (to allow credit for CPR, AED, and basic life support training) and 12 AAC 16.430 Professional Standards (to recognize the Croft Guidelines). They suggested a slight change to 12 AAC 16.290(f): "...a licensee may receive up to four hours... from one **or more** of the following..."

The regulations became effective on November 28, 2009. The filed version of the regulations were included in the Board packet for further review.

Adopt new regulations project

The Board reviewed proposed changes to the following regulations, which were public noticed on 11/25/09:

1. 12 AAC 16.030 Criminal background report required for licensure by examination.
2. 12 AAC 16.031 Criminal background report required for temporary permit for locum tenens practice.
3. 12 AAC 16.033 Criminal background report required for licensure by credentials.
4. 12 AAC 16.048 Chiropractic Sports Physician (DACBSP) program administered by the American Chiropractic Board of Sports Physicians.
5. 12 AAC 16.130 State Chiropractic Examination includes both written and oral examinations.
6. 12 AAC 16.200 Criminal background report required for a temporary permit.
7. 12 AAC 16.205 Criminal background report required for application for a courtesy license.
8. 12 AAC 16.290 Two hours of continuing education credit allowed for completing an online review of the chiropractic statutes and regulations; course approval number required on renewal applications.
9. 12 AAC 16.990 Definition of "criminal history record information."

The Board also reviewed and approved language changes proposed by the Department of Law regarding the criminal background information.

The Board noted that, although no public comments were received, they paid special attention to the cost to private persons of the regulatory action being taken.

Upon a motion duly made by Dr. Zimmerman, seconded by Dr. Heston, and approved unanimously, it was:

RESOLVED to adopt the regulation changes, as amended.

The adoption order was signed.

Discuss new statute project – retroactive claim reviews

The Board had previously discussed the lack of a statutory limit to retroactive insurance reviews and reviewed information regarding other state's requirements. They reviewed a draft statute change to Alaska Statute (AS) 21.54.020(d), to add "A request for reimbursement of an amount mistakenly paid must be made in writing within 90 days of the date of the payment." They determined to support the Alaska Chiropractic Society (ACS) in their efforts to implement such a statutory limit, as proposed, or other appropriate language that may also include a provision to limit fraud accusations. They directed Ms. Stovern to provide the draft to ACS. Dr. Heston volunteered to provide his research information on other state's requirements.

Discuss new statute project – licensing

The Board had previously considered the option of adding a massage therapy licensing program to the Chiropractic Board, since professional relationships between chiropractors and massage therapists are so prevalent. At their last meeting, the Board reviewed a draft statute project the included proposed language for adding a massage therapist to the Board and for licensing of massage therapists, as well as licensing of chiropractic assistants, technicians, interns/preceptors, licensing chiropractic facilities, regulating IMEs, regulating physical exams, increasing fines, and establishing an executive administrator to assist with these additional responsibilities. At that time, the Board determined to separate the draft into two projects: one package including only chiropractic items and one package including the massage therapist items.

The Board reconsidered their interest in pursuing both projects. They determined to recombine the two projects into one, and to support the Alaska Chiropractic Society (ACS) in their efforts to pass the entire package as soon as possible. They also determined to change the name of the Peer Review Committee to Utilization Review Committee and correct the language for review requests.

Upon a motion duly made by Dr. Holt, seconded by Mr. Garness, and approved unanimously, it was:

RESOLVED to forward the amended statute proposal to the Alaska Chiropractic Society (ACS) and support the passage of the entire project.

It was noted that passage of the statute change would accomplish nearly all of the objectives under the statutory changes goal in the Board's Goals and Objectives. They directed Ms. Stovern to provide the draft to ACS to pursue.

Discuss status of “omnibus bill”

The Board had previously been briefed on an Omnibus Bill by Investigative Staff Susan Winton. At that time, the bill was in draft form and had not been introduced in the legislature. The Board directed Ms. Stovern to contact Ms. Winton and or the Department Legislative Liaison to learn the status of the bill.

Agenda Item 8 – Public Comment

There were no members of the public present. Public comment was closed at 12:00 p.m.

Recess for lunch

The Board recessed for lunch at 12:45 p.m.

The Board resumed the meeting at 2:05 p.m. All members were present.

Agenda Item 9 – Alaska Chiropractic Society Update

Debbie Ryan, ACS Executive Director, joined the meeting by teleconference to report on the following activities:

- ACS Annual Convention, October 1-3, 2010, at the Anchorage Captain Cook Hotel – will feature seminars professional boundaries, diversity, and ethics, as requested by the Board; also, nutrition, diabetes, and a chiropractic assistant program.
- FCLB certification program for chiropractic assistants.
- ACS President Kurt Hediger was in Washington DC attending a conference on Medicaid issues.
- Chiropractic advertising requirements.
- The ACS is interested in pursuing statute projects regarding retroactive insurance reviews, regulating chiropractic assistants and preceptorships.

The Board noted their goal of working cooperatively with the ACS in the best interest of the profession and the public, including encouraging regular ACS participation at Board meetings, supporting ACS efforts to provide information to the profession and the public, and supporting ACS efforts in pursuing statutory changes relevant to the profession and public safety.

The Board directed Ms. Stovern to provide the draft statute projects to the ACS so they can work with their lobbyist to have it introduced as soon as possible.

Agenda Item 9 – Division Updates

Budget Report

The Board reviewed the Budget Report prepared by the Division Administrative Officer. Expenditures and revenues appear to be as expected when the last analysis was done, and appear to support the reduction in licensing fees.

Board Website

The Board had previously directed Ms. Stovern to have the Board website updated. She reported that the following changes are in process: updating the 2010 meeting schedule, adding 2009 approved minutes, adding the 2010 investigative report. She encouraged Board members to review the site and provide feedback.

Online Jurisprudence Review

The Board had previously determined to begin administering an online jurisprudence review to renewal applicants wishing to earn continuing education credit for reading the statutes and regulations. During agenda item 6, the Board adopted regulations to implement such a review for the next renewal. Ms. Stovern reported that she had built a demonstration version of the review on www.myicourse.com (the web-based resource used by the Minnesota Board). Board members will experiment with the online review and provide feedback. All members will write questions for the review, to be selected by the Board at the next meeting.

Agenda Item 11 – Exam Review/Update

The Board had previously determined to return to administering an oral exam in addition to the written exam. During agenda item 6, the Board adopted regulations to implement that change.

Upon a motion duly made by Mr. Garness, seconded by Dr. Heston, and approved unanimously, it was:

RESOLVED to enter into executive session in accordance with AS 44.62.310(c)(2) and (3), and Alaska Constitutional Rights to Privacy Provisions for the purpose of discussing the examination.

The Board entered executive session at 4:17 p.m.

The Board went back on the record at 4:35 p.m.

Agenda Item 12 – Application Review

Specialty Designation Applications

The Board reviewed applications for specialty designation from Daniel Larson and Rosemary Zimmerman. It was noted that the application for Dr. Larson had been tabled

during a previous mail vote, pending renewal of his certification and clarification of the correct specialty designation.

Upon a motion duly made by Dr. Zimmerman, seconded by Dr. Holt, and approved unanimously, it was

RESOLVED to approve the CCSP and ACRB Registry Level 1 specialty designations for Dr. Daniel Larson, pending payment of the required fees.

Upon a motion duly made by Dr. Heston, seconded by Mr. Garness, and approved unanimously, it was

RESOLVED to approve the DACBSP specialty designation for Dr. Rosemary Zimmerman.

License Application

The Board reviewed the application for licensure by examination from Daryl S. Chalifour. They had previously approved him to sit for the exam only, because the application was not entirely complete at that time. The application is now complete.

Upon a motion duly made by Dr. Zimmerman, seconded by Mr. Garness, and approved unanimously, it was

RESOLVED to approve the license application by Daryl S. Chalifour, pending passage of the exam and payment of the license fees.

Exam Application

The Board reviewed an application from Elizabeth Keeter, who is applying to sit for the June exam and subsequent licensure, and is also applying for a temporary permit.

Upon a motion duly made by Dr. Holt, seconded by Dr. Heston, and approved unanimously, it was

RESOLVED to approve Elizabeth Keeter to sit for the Alaska State Chiropractic Examination, and for issuance of a temporary permit, and for full licensure upon passage of the exam and payment of license fees.

Continuing Education Review

The Board was scheduled to review continuing education (CE) documentation for an applicant for reinstatement. However, Ms. Stovern reported that the documentation had not been submitted. She will submit it to Board members for a mail vote once it is received.

The Board has been regularly reviewing applications for continuing education course approval by mail vote. There were no additional courses for review at the meeting.

Agenda Item 13 – Peer Review Committee

Committee update

The Board reviewed the current committee roster: Dr. Mark Barbee (term expires 1/18/11), Dr. Gregory Culbert (term expired 1/18/10), Dr. Steven Messerschmidt (term expired 1/18/10), and Martha Summerfield, public member (term expires 1/18/11).

Upon a motion duly made by Dr. Zimmerman, seconded by Dr. Holt, and approved unanimously, it was

RESOLVED to reappoint Dr. Culbert and Dr. Messerschmidt to the Peer Review Committee, with terms expiring January 18, 2012.

Ms. Stovern will notify the members of their reappointments. If either declines their reappointment, the Board will review the committee roster at their next meeting.

Discuss committee name change

The Board had previously determined to change the name of the committee to “Utilization Review Committee” to eliminate confusion with the peer review process under the court system. During agenda item 6, the Board resolved to support the name change in the draft statute project.

Review peer review guidelines

Dr. Heston had previously volunteered to serve as the Board liaison to the committee; he will work with the committee to update the Peer Review Information booklet for Board approval at the next meeting. A copy of the booklet was included in the agenda packet for further review. (The booklet outlines the Peer Review processes and resources, and was last updated in 2005.)

Agenda Item 14 – Federation of Chiropractic Licensing Boards

Report on recent meetings

Dr. Heston attended the FCLB District I meeting in Keystone, SD in October 2009. Topics of the meeting included certification of chiropractic assistants, facility licensure, preceptor and interns, documentation and recordkeeping strategies, criminal background checks, disciplinary actions, and animal chiropractic.

The Board determined that they would like to research and pursue the issue of animal chiropractic in the State of Alaska.

Upcoming meetings

Dr. Zimmerman and Ms. Stovern will be attending the May 2010 FCLB annual conference in Baltimore, MD.

The Board noted that FCLB is a good resource as they consider licensing chiropractic assistants, technician, interns/preceptors, and facilities in Alaska, and as they implement criminal background checks and research animal chiropractic. All of these topics are included on the agenda for the conference.

District Director update

Dr. Carol Davis, the FCLB District I Director, was unable to participate in the meeting. A copy of her newsletter was included in the agenda packet for further review.

Agenda Item 15 – National Board of Chiropractic Examiners

Annual participation in both Part IV exams and the Part IV exam test committee meeting, as well as periodic participation in other exams, is contractual obligation of the Board. Such participation also keeps the Board involved and aware of the defensibility of the exams required for licensure in the State of Alaska.

Ms. Stovern distributed a three-year schedule of exam and test committee dates obtained from NBCE for Board consideration. The Board has participated regularly in the administration of the Part IV exam, but has been unable to commit to test committee meetings. Travel expenses to participate as examiners and attend test committee meetings are covered by NBCE.

Dr. Holt volunteered to participate as an examiner for the May 14-16, 2010 administration of the Part IV exam; Dr. Heston and Dr. Zimmerman volunteered to participate as examiners for the November 12-14, 2010 administration of the Part IV exam. Participation requires a commitment to a Friday evening training session and all-day examinations on Saturday and Sunday.

Upon a motion duly made by Dr. Holt, seconded by Dr. Zimmerman, and approved unanimously, it was

RESOLVED to send Drs. Holt, Heston, and Zimmerman as examiners for the May and/or November 2010 administration of the NBCE Part IV examination.

Dr. Holt volunteered to attend the June 11-12, 2010 Part IV test committee meeting, if his schedule permits. In the event Dr. Holt is unable to participate, Dr. Zimmerman will attend.

Upon a motion duly made by Dr. Zimmerman, seconded by Dr. Heston, and approved unanimously, it was

RESOLVED to send Dr. Holt or Dr. Zimmerman to the June 2010 NBCE Part IV test committee meeting.

It was noted that, under the Ethics Act, Board members may not accept honorariums for their participation in these types of activities because they are not allowed to benefit from their service on the Board.

Agenda Item 16 – New Business

Dr. Heston requested Board guidance regarding the practice of “contact care” in his community. Another chiropractor believes it may be the practice of chiropractic without a license. The Board directed him to refer that chiropractor to the investigator.

Dr. Heston reported that he had been invited to serve on the Board of Trustees at a Chiropractic College; he noted that there would be no financial interest in the position. The Chair determined that such service would not be a conflict of interest, but suggested that if he accepts the position he should report it at each meeting.

Agenda Item 17 – Correspondence

Dr. Hopkins – questions about supervising and billing re: offsite massage therapist – The Board noted that he cannot supervise an offsite massage therapist; also, since the Board does not regulate billing, recommended that he contact ACS and/or his malpractice carrier for billing information. Ms. Stovern will respond.

Dr. Campbell – comments on exam schedule – No response necessary.

FCLB – response to Allen Botnick complaint about CCE-accreditation of Life Chiropractic College – Ms. Stovern distributed a recent update. No response necessary; the Board will monitor and research the issue before considering any action.

FCLB – update on merger of NPDB and HIPDB data – No response necessary.

FCLB – European CCE accreditation – No response necessary; however, the Board may want to consider developing future regulations regarding foreign training of chiropractors.

ACS – notice re: NJ scope of practice – No response necessary.

ACS – press release re: Medicare demo project – No response necessary.

ACS – notice re: Chiropractic summit (natl. issues) – No response necessary.

ACS – progress report from Council on Chiropractic Guidelines and Practice Parameters – No response necessary.

ACA – update on national health care reform – No response necessary.

Agenda Item 17 – Administrative Business

Confirm 2010 Meeting and Exam Schedule

The Board confirmed the 2010 meeting and exam schedule:

- February 26-27 in Juneau
- June 18-19 in Homer
- October 15-16 in Anchorage

Sign wall certificates

Board members signed wall certificates for Benjamin J. Pontius, Bradley D. Mangum, Shawn D. Lovdahl, Jaime R. Dequine, Konstantine E. Bunde, Kelly L. Cox, Tyler L. Adams, and Weston L. Hopkins.

Sign minutes

The chair signed the approved minutes from the September 11, 2009 meeting.

Sign TAs and collect receipts

Board members signed Travel Authorization forms and submitted receipts.

There being no further business,

Upon a motion duly made by Dr. Mulholland, seconded by Dr. Zimmerman, and approved unanimously, it was:

RESOLVED to adjourn the meeting of the Alaska State Board of Chiropractic Examiners.

The meeting adjourned at 6:41 p.m.

Respectfully Submitted:

Debora Stovern
Licensing Examiner

Approved:

Dr. David Mulholland, Chair
Alaska State Board of Chiropractic Examiners

Date:_____