

1 State of Alaska  
2 Department of Commerce, Community and Economic Development  
3 Division of Corporations, Business and Professional Licensing  
4

5 BOARD OF CHIROPRACTIC EXAMINERS  
6

7 MINUTES OF THE MEETING  
8 Friday, February 12<sup>th</sup>, 2021

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10 By authority of AS 08.01.070(2), and in compliance with the provisions of AS 44.62, Article 6, a  
11 scheduled meeting of the Board of Chiropractic Examiners was held via Videoconference on  
12 November 13, 2020.  
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14 Friday, November 13, 2020

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16 **Agenda Item 1** Call to Order/Roll Call **Time: 10:13 a.m.**

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18 The meeting was called to order by Chairman, Brian Larson, at 10:13 a.m.  
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20 Board Members present, constituting a quorum:  
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22 Brian Larson, Doctor of Chiropractic  
23 Jonathan Vito, Doctor of Chiropractic  
24 James Morris, Doctor of Chiropractic  
25 John Lloyd, Doctor of Chiropractic  
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27 Division Staff present were:  
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29 Tracy Wiard, Occupational Licensing Examiner  
30 Thomas Bay, Occupational Licensing Examiner  
31 Joseph Bonnell, Licensing Supervisor  
32 Jasmin Bautista, Investigator (*present at 1:14 p.m.*)  
33 Sara Chambers, Division Director (*via videoconference at 2:35 p.m.*)  
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35 Present from the Public:  
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37 Sheri Ryan, Chief Operating Officer, Alaska Chiropractic Society  
38 Debbi Ryan, Alaska Chiropractic Society  
39 Zachary Kennedy, Chief Auditor, Division of Legislative Audit  
40 Lewis Pagel  
41 Edward Barrington  
42 R. Hoffard, MPC  
43 Greg Sampson  
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46 **Agenda Item 2** Review/Approve Agenda **Time: 10:09 a.m.**

47 After the roll call, chair, Dr. Larson asked the board to review the agenda.  
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49 On a motion duly made by Jonathan Vito, seconded by James Morris, and approved  
50 unanimously by a roll call, it was

51  
52 **RESOLVED** to approve the agenda as written.

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55 **Agenda Item 3** Review/Approve Meeting Minutes **Time: 10:10 a.m.**

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57 The board reviewed the meeting minutes from August 21st, 2020.

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59 On a motion duly made by Jonathan Vito, seconded by James Morris, and approved by  
60 majority through roll call, it was

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62 **RESOLVED** to approve the meeting minutes from the August 21<sup>st</sup>, 2020 meeting as  
63 written.

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65 **Agenda Item 4** Board Business **Time: 10:35 a.m.**

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67 New Public Board Member

68 Mr. Gabriel King joined the board meeting at 10:35 a.m. Being the new public member on the Board  
69 of Chiropractic Examiners, Dr. Larson asked him to introduce himself to the board. He resides in  
70 Fairbanks and works as a fire fighter. He was welcomed to the board and everyone was happy to have  
71 a full board and thanked him for joining.

72  
73 Ethics Report

74 Dr. Larson addressed ethics reporting. The board had no ethical violations to report.

75  
76 Review Goals & Objectives

77 The board began discussion on their goals and objectives.

- 78  
79 • Task List from August 21, 2020, Board Meeting & Annual Report:  
80 Dr. Larson reviewed the previous task list that the board created from the August 21, 2020  
81 meeting. Dr. Larson explained that many of the tasks on the list were not able to be  
82 accomplished as the board was informed by the Department of Law that they could not legally  
83 change the definitions the board wanted to change due to discrepancies in the board's statutes.  
84 The statutes specify chiropractors work without performing surgery or prescribing drugs and  
85 the statutes would need amendments to allow the board's proposals.

86  
87 Dr. Larson went on to explain that the definition of chiropractic core methodologies was  
88 inconsistent with many of the regulatory changes the board wanted to make. It was  
89 determined that the items requested to be changed may be outside the scope of practice for  
90 chiropractors. Dr. Larson stated the board wanted to address changes to the subluxation  
91 complex. He stated many states have dropped the discussion of subluxation philosophy and  
92 have replaced it with the concept of neuromuscular joint dysfunction and it has been found to  
93 be more consistent and understood throughout the healthcare community. Dr. Larson then  
94 asked the board for ideas and discussion on the topic of neuromuscular joint dysfunction and  
95 how it would benefit the board to modernize the language through legislation.

96  
97 Dr. Vito felt that modernizing the term would be a good idea as it would encompass the scope  
98 of practice used for chiropractors and would not be confused by other medical professionals

99 who may think subluxation complex is referring to a partial dislocation. Dr. Morris believed  
100 the term subluxation complex needed to be updated as well. He stated it is obvious  
101 chiropractors take care of many musculoskeletal issues and it would be a good idea to get some  
102 language that supports that. At the same token he stated it was important to keep some of the  
103 language already established regarding vertebral subluxation and core methodology with the  
104 chiropractor's current language but adding neuromuscular joint dysfunction to encompass  
105 everything chiropractors do. Dr. Morris stated that, "Once the language is established the  
106 board can then address scope of practice issues."  
107

108 Dr. Larson wanted to bring the new board member up to date. He referred to the board's  
109 statutes and regulations, stating a person licensed under this chapter may analyze, diagnose and  
110 treat the chiropractic condition of a patient by utilizing chiropractic core methodology or  
111 ancillary methodology. Dr. Larson went on to explain that in Alaska law, all areas of practice  
112 must specify what that area is. For medical doctors and osteopaths, it simply says they are  
113 medical doctors. For nurse practitioners there needs to be specification that they are using a  
114 nursing diagnosis. Chiropractors use the chiropractic diagnosis. This specifies the area of  
115 treatment used.  
116

117 Dr. Larson went on to read the definitions of ancillary methodology and chiropractic core  
118 methodology. He explained that chiropractic core methodology is without the use of  
119 prescription drugs and surgery and licensed chiropractors can only operate within the scope of  
120 practice defined in the statutes and regulations which are over 30 years old. He went on to  
121 explain, this definition of chiropractic core methodology limits the scope of ancillary methods  
122 according to interpretation by law.  
123

124 Dr. Larson continued to explain that in more recent years, the practice of chiropractic has been  
125 expanding, more specialties have been introduced to the practice and education has been  
126 improving. Alaska statutes and regulations are behind the curve regarding procedures a  
127 chiropractic doctor can perform. It would be nice if the regulations matched the scope of  
128 practice. Dr. Larson stated the regulations state any use of a needle would constitute surgery,  
129 but a hypodermic needle can be used for venipuncture. In addition, Dr. Larson stated most  
130 supplements in a chiropractic office for sale would constitute a prescription drug which could  
131 be outside the scope of practice. Dr. Larson stated these methodologies are being used all  
132 over the country in other states and is not a new practice. He also stated it has been discussed  
133 to add a medicine ledger to the practice for prescribing antibiotics, nutritional injections, etc.  
134 Dr. Larson added that sometimes the chiropractor is the only medical profession in a village.  
135

136 Dr. Larson spoke about the recent board chair meeting that deals with medical boards  
137 addressing the Covid-19 pandemic. OLE Thomas Bay stated there may have been a  
138 misunderstanding regarding the meeting of board chairs at the last Covid-19 meeting. He  
139 believed the chairs were being asked if they would be willing to perform Covid-19  
140 immunizations if the legislation administered emergency regulations allowing chiropractors and  
141 other health care practitioners to do so.  
142

143 Other items on the board's task list were discussed, including the contract with the NBCE  
144 allowing them to administer their EBAS exam, as a disciplinary tool, and the board's  
145 jurisprudence examination across the country at their testing locations. Division staff explained  
146 this would be a slow-moving process and the new records and licensing supervisor was aware  
147 of the issue and getting the ball rolling on it. Division staff also informed the board that there  
148 is no contract yet, but it was in process.

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The board moved on to discuss the recently adopted regulations requiring all Certified Chiropractic Clinical Assistants to be credentialed no later than February 23, 2021. All newly hired clinical assistants will have one year from date of hire to complete the credentialing process. Sheri Ryan informed the board that the Alaska Chiropractic Society has been informing chiropractic doctors with questions that this is a requirement for anyone performing procedures typical of a chiropractic assistant.

Dr. Lloyd stated that he has been asked if clinics that employ a physical therapist and a chiropractor, if the chiropractic assistant works primarily with the physical therapist, is the credentialing of the clinical assistant still required. Dr. Lloyd added that, according to regulations, the clinical assistant is still required to be certified. They would need the credential to be able to perform standing orders. Physical therapy aids have their own requirements to adhere to.

Dr. Larson asked if the assistants could perform their tasks while the chiropractor was out of the building or if they needed to be present. OLE Thomas Bay informed the board that when he asked the regulations specialist their opinion regarding the regulations, the term, “under general supervision,” is vague and may need further interpretation from law. Dr. Larson informed the board that the term personal supervision was to be used for interns only. The only time an intern is under direct supervision is when they are performing a chiropractic adjustment. There is a difference regarding the supervision used for interns vs. assistants. They are in the regulations.

Sheri Ryan addressed the board and offered to answer Dr. Larson’s question, as she had been involved with the regulatory change from its onset and understood the initial intent. She stated that the original intent was not just to deal with standing orders but to deal with minimal education requirements of chiropractic assistants. Sheri Ryan informed the board that the regulations allowed the board to have authority over the desired education required to be a chiropractic assistant in Alaska. The regulations also deal with the insurance companies that were saying chiropractors could not delegate tasks to chiropractic assistants because they were not trained, licensed or competent to do so. The required certification mitigates these issues for any assistant who performs any hands-on procedures. OLE Tracy Wiard asked if the board would like to create a license type for chiropractic assistants. Sheri Ryan stated the fiscal note that would have accompanied the legislation was astronomical and it was found at the time that the Board of Chiropractic Examiners could not afford the cost or the additional work load. This resulted in the requirements of a national certification in regulation as opposed to a state issued license. The Alaska Chiropractic Society has a method for obtaining reporting requirements for clinical chiropractor assistants and it is then reported to the Board of Chiropractic Examiners. Dr. Lloyd suggested the board do a PR for chiropractors in the state so they understand the reasoning and the benefits of having a certified assistant.

Sheri Ryan went on to explain that assistants who have been employed for a time and already have the training may opt to take the certification exam only. Those assistants who do not have the knowledge and training of the assistant, may take the training component as well as the test. Many assistants are opting to take that route, but it is not required. It was also stated that a new assistant has one year from date of hire to obtain the certification. With that in mind, the assistant cannot perform any procedures they are not competently trained to perform. OLE Tracy Wiard suggested the board may be interested in writing a position statement for the board’s website.

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**On a motion duly made by Jonathan Vito, seconded by Gabriel King, and approved unanimously by a roll call, it was**

**RESOLVED to have Dr. Morris write the certified clinical chiropractic assistant position statement for the board website with the assistance of Sheri Ryan.**

Ratify New Licenses:

Having finished with the discussion of the previous task list and the boards annual report goals, the board began discussion on ratifying the new licenses for licensees who sat for the February 21st, 2020, jurisprudence examination.

**On a motion duly made by Jonathan Vito, seconded by James Morris, and approved unanimously by a roll call, it was**

**RESOLVED to ratify the license for Joseph Wojciechowski III.**

**Agenda Item 5**

**Statutes and Regulations**

**Time: 11:40 a.m.**

Regulations Discussion:

A question was asked if there was any update on the statutes and regulations project. Dr. Larson stated, after talking with the Department of Law, it was determined the board needs to talk to the legislature about revising the scope of practice before any further changes could be made. Dr. Larson stated he was working with Dr. Morris to redefine the definition of chiropractic. Dr. Larson stated, it needs to be revised from stating it is the science of the subluxation complex to be performed without surgery or drugs. Many people have felt that the term ancillary methodology would mean, with proper training, some needles (excising living tissue) and prescription drugs should be allowable. Unless the legislature wishes to expand the scope of practice to include these things, the board may not move forward with their proposed changes.

Dr. Larson asked Sheri Ryan if the ACS had any updates from their board for proposed redefining of the term chiropractic for legislation. Sheri Ryan stated she did not think the scope change would be impossible, if much of the scope remained the same. She believes that the removal of subluxation complex may alarm many chiropractors in the state. Sheri Ryan suggested, a better task may be to modernize the language to include musculoskeletal joint dysfunction. The problem with the board's proposed changes was not so much the reference to surgery, but that the changes did not reflect on the chiropractic core methodology. This was the problem with dry needling and incising. Dr. Larson asked if the board could obtain their own legal counsel outside the state. OLE Tracy Wiard informed the board it was not in their purview to hire outside legal representation to review the definitions proposed by the board.

**Agenda Item 6**

**Covid-19**

**Time: 11:55 a.m.**

Covid-19 Discussion:

Dr. Larson discussed with the board the formation of the medical board chairs group to meet and discuss the status of covid-19. This group has been meeting biweekly for some time. The group discusses plans and procedures for remaining in business and helping hospitals and clinics that may become overrun with patients infected with Covid-19. It was suggested that the boards may want to take over the procedures for practicing safe patient care as the governor was gearing towards moving

249 away from the state mandates. It would be beneficial for the board to have guidance for practitioners  
250 considering the mandates. Currently, the mandates were extended for another 30 days but once the  
251 mandates are over, the boards would want to have procedures in place to maintain the safety of  
252 patients and providers. The board reviewed Dr. Larson's letter regarding this topic.  
253 Dr. Morris suggested that Dr. Larson's letter address compliance with local mandates in addition to  
254 the state mandates as some local mandates may supersede the state mandates. Dr. Vito agreed with  
255 Dr. Morris's suggestion. Dr. Larson asked the board members for further thoughts. The board  
256 thanked Dr. Larson for his contribution and clarification regarding proper procedures for remaining in  
257 practice while handling the Covid-19 pandemic.

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259 Off Record: 12:17 p.m.

260 On Record: 1:12 p.m.

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262 The meeting was called back to order by Chairman, Brian Larson, at 1:12 p.m.

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264 Board Members present, constituting a quorum:

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266 Brian Larson, Doctor of Chiropractic

267 Jonathan Vito, Doctor of Chiropractic

268 James Morris, Doctor of Chiropractic

269 John Lloyd, Doctor of Chiropractic

270 Gabriel King, Public Member (*Joined telephonically at 10:22 a.m.*)

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272 Division Staff present were:

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274 Tracy Wiard, Occupational Licensing Examiner

275 Thomas Bay, Occupational Licensing Examiner

276 Jasmin Bautista, Investigator (*present at 1:14 p.m.*)

277 Melissa Dumas, Administrative Officer (*via videoconference at 2:35 p.m.*)

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279 Present from the Public:

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281 Sheri Ryan, Chief Operating Officer, Alaska Chiropractic Society

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283 **Agenda Item 6**

**Covid-19**

**Time: 1:12 p.m.**

284

285 Dr. Larson picked up with the discussion of the Covid-19 letter he had drafted prior to lunch and read  
286 the letter to the board. He had drafted the changes that the board recommended prior to lunch and  
287 wanted the board to discuss. It was stated the board could continue to review through On Board and  
288 make any required suggested changes, or could vote to approve and add to the board's website.

289

290 **On a motion duly made by Jonathan Vito, seconded by James Morris, and approved**  
291 **unanimously by a roll call, it was**

292

293 **RESOLVED to add Dr. Larson's Covid-19 letter to On Board for board review or**  
294 **approval and add to the State of Alaska Board of Chiropractic Examiners Website.**

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296

297 **Agenda Item 8**

**Fall District Meeting**

**Time: 1:15 p.m.**

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299 It was stated that the letter from the FCLB regarding the fall district meeting was never received.  
300 There was no letter to review as planned on the agenda.

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302 **Agenda Item 9** **Investigative Report** **Time: 1:20 p.m**

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304 Investigative Report:

305 Investigator Jasmin Bautista joined the meeting to provide the investigative report for the dates  
306 08/06/2020-11/05/2020. The report included cases, investigations, intakes and complaints that were  
307 received during that timeframe. Jasmin reminded the board that any cases regarding continuing  
308 education audits are with the paralegal and not part of this report.

309  
310 There were four open cases with the board's investigations team. There were three cases that were  
311 closed during this timeframe. There was an incomplete complaint. This means there was a call or  
312 complaint in the mail and when the investigations team followed up with the forms and affidavit the  
313 investigations team never received the complaint form back. The second closed investigation was an  
314 investigation review and the last was a license action. There were no other questions from the board  
315 regarding the investigations report.

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317 **Agenda Item 10** **ACS Update** **Time: 1:25 p.m.**

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319 ACS Report:

320 The board moved on to the report from the Alaska Chiropractic Society staff. Debbie Ryan was  
321 unable to attend the board meeting. Sheri Ryan provided the report for the board. She stated the  
322 ACS is monitoring the proposed CMS 2021 reimbursement cuts for chiropractic services. Overall,  
323 CMS will be increasing reimbursement for E&M (evaluation and management codes) and reducing  
324 reimbursement for other codes as part of the HSS budget neutrality. Chiropractic services are some of  
325 the other cuts that will be made to account for the increased E&M payments. CMS cuts are 10% but  
326 because of the relative value units, the cuts come out to about 19.5%. The affects will have all  
327 insurances reducing their reimbursements because all insurance companies base payments off CMS  
328 coverage.

329 ACS submitted public comment to CMS which ended in October. ACS ran a campaign to educate the  
330 US Congressional contingency to inform them of the far-reaching consequences. The proposed cuts  
331 were discussed with Alaska Representatives and Senators and the thought from the Congress was that  
332 chiropractic physicians would make up the cuts with the increased E&M code reimbursement. It was  
333 unknown to the Congress that chiropractors do not get a reimbursement for E&M codes and will be  
334 affected by this CMS change in a negative way. ACS did make comments on the issue on behalf of the  
335 chiropractors who are licensed in Alaska.

336 Recent legislation was introduced in the house that would address the budget neutrality and the  
337 conversion factor. ACS is putting together a campaign to reach out to the Representatives and  
338 Senators to hold chiropractors at the current reimbursement level until 2022. It would allow the E&M  
339 increases without the decreases in chiropractic care. This would prevent the cuts coming from other  
340 insurance companies like Alaska Workers Comp and Aetna.

341 ACS also put out a webinar regarding changed codes in the CPT for chiropractic care. The ACS  
342 hosted a billing boot camp that was very well received. If the Alaska chiropractors are not up to speed

343 on coding changes, they will have denied reimbursements on insurance claims. The boot camp also  
344 discussed many ethical issues regarding writing off copays and deductibles.

345  
346 Dr. Larson asked about issues with Blue Cross Blue Shield in Texas not reimbursing for massage  
347 therapy treatment. Sherri Ryan stated the association has reached out numerous times. The  
348 employees may be in state but the insurance companies are out of state. If the provider is in network,  
349 Premera Blue Cross Blue Shield requires in network providers to code a certain way for the massage.  
350 Sheri Ryan recommended a grass roots campaign as many people are getting denied coverage for  
351 services their insurance should cover. If the office is not a Premera network office, then it is  
352 appropriate for the office to bill the massage under the DC NPI number. The board went on to  
353 discuss certain massage CPT codes.

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357 **Agenda Item 11** **Correspondence** **Time: 1:40 p.m.**

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- 359 • Letter Regarding Previous Regulations Project:  
360 There was a letter that was requested to be read for board review from Dr. Shannon and Dr.  
361 McAfee. The letter addressed the meeting minutes from the BOCE's August 2020 meeting.  
362 The doctors asked the board to continue on with their attempts to change regulations allowing  
363 for nutritionals to be prescribed as part of the chiropractic scope of practice as well as the  
364 many ancillary methods the board had discussed with LAW and Director Chambers. The  
365 board reviewed the letter and took the comments into consideration for future regulation  
366 revisions and projects.

367  
368 OLE Thomas Bay addressed the board informing them that he did pass this question of  
369 whether the board could pass the regulations without the approval of law and Mr. Bay was  
370 informed that could not be done. Dr. Larson inquired why this was. Mr. Bay informed Dr.  
371 Larson that Director Chambers was aware of the letter and if he had any questions she would  
372 be happy to speak with him about it. Dr. Larson stated he would reach out to Director  
373 Chambers regarding the matter and discuss the issue with her. Dr. Larson would then write  
374 out the context of the conversation via OnBoard so the board could obtain the information.

375  
376 The next e-mail was from Chirocredit.com asking to be added to the CCCA and PACE  
377 provider list on the board's website. OLE Thomas Bay informed the board that the provider  
378 list was going to be updated and Chirocredit.com is already listed as a PACE approved  
379 provider on the FCLB website. The link will show them as a provider on the FCLB site. One  
380 continuing education provider cannot be singled out over the others. OLE Tracy Wiard to  
381 write an e-mail informing them they are already listed on the approved provider's website at  
382 FCLB. Mr. Bay asked Sheri Ryan if Chirocredit.com is a CCCA provider. Sheri Ryan stated  
383 Chirocredit.com is an education provider but not a certification provider.

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385 **Agenda Item 12** **Budget Report/Division Update** **Time: 2:15 p.m.**

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387 The division's Administration Officer Melissa Dumas provided the 4<sup>th</sup> quarter FY 20 budget report  
388 and annual report. The division report is in the board packet and provides all the expenditures and  
389 revenue generated for the board during FY 20 as well as indirect expenditures.

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<b>Revenue</b>	
Revenue from License Fees	\$ 24,395
Allowable Third Party Reimbursements	\$ -
<b>TOTAL REVENUE</b>	<b>\$ 24,395</b>
<b>Expenditures</b>	
Non Investigation Expenditures	
1000 - Personal Services 2000	73,885
- Travel	5,152
3000 - Services	13,719
4000 - Commodities 5000 -	-
Capital Outlay	-
Total Non-Investigation Expenditures	92,756
Investigation Expenditures 1000-	
Personal Services 2000 - Travel	5,622
3023 - Expert Witness 3088 -	-
Inter-Agency Legal	-
3094 - Inter-Agency Hearing/Mediation 3000 -	7,077
Services other	-
4000 - Commodities	7
Total Investigation Expenditures	-
	12,706
<b>Total Direct Expenditures</b>	
	105,462
Indirect Expenditures	
Internal Administrative Costs	
Departmental Costs Statewide	15,826
Costs	10,926
<b>Total Indirect Expenditures</b>	10,474
	37,226
<b>TOTAL EXPENDITURES</b>	<b>\$ 142,688</b>
<b>Cumulative Surplus (Deficit) Beginning</b>	
Cumulative Surplus (Deficit) Annual	\$ 78,465
Increase/(Decrease)	(118,293)
Ending Cumulative Surplus (Deficit)	(39,828)
	Fee analysis required
<b>Statistical Information</b>	
Number of Licenses for Indirect calculation	343

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Off Record: 2:25 p.m.  
On Record: 2:42 p.m.

The meeting was called back to order by Chairman, Brian Larson, at 2:42 p.m.

Board Members present, constituting a quorum:

Brian Larson, Doctor of Chiropractic  
Jonathan Vito, Doctor of Chiropractic  
John Lloyd, Doctor of Chiropractic  
Gabriel King, Public Member *(Joined telephonically at 10:22 a.m.)*

Division Staff present were:

Tracy Wiard, Occupational Licensing Examiner  
Thomas Bay, Occupational Licensing Examiner

Present from the Public:

Sheri Ryan, Chief Operating Officer, Alaska Chiropractic Society

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415 • Set Next Meeting: The board voted to set the next meeting dates. The board agreed to hold  
416 the next meeting on Friday, February 12<sup>th</sup>, 2021. The board also agreed to hold the 2<sup>nd</sup>  
417 meeting of 2021 on Thursday, April 29<sup>th</sup>, 2021. OLE Tracy Wiard will set up the meeting.

418 • Task List: OLE Tracy Wiard read over the tasks the board created during today's meeting.  
419 The list contained the following, which will also be e-mailed to the board:

- 420 ○ **TASK: Dr. Morris with help from Sheri Ryan will create a board position**  
421 **statement for the Board of Chiropractic Examiners website regarding CCCA**  
422 **regulations.**
- 423 ○ **TASK: OLE Tracy Wiard will e-mail Board of Chiropractic Examiners statutes**  
424 **and regulations to Mr. Gabriel King.**
- 425 ○ **TASK: Dr. Larson will contact Director Chambers regarding why the board**  
426 **cannot pass their regulations project without approval from LAW and write a**  
427 **draft of the conversation for the board via OnBoard.**
- 428 ○ **OLE Tracy Wiard will reply to chirocredit.com e-mail.**
- 429 ○ **Dr. Larson and Dr. Morris will continue working on legislation.**
- 430 ○ **OLE Tracy Wiard will add Dr. Larson's Covid-19 letter to OnBoard for board**  
431 **review or approval and add to the State of Alaska Board of Chiropractic**  
432 **Examiners Website.**

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438 No one called in for public comment.

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455 **On a motion duly made by Jonathan Vito, seconded by John Lloyd, it was**

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457 **RESOLVED to adjourn the meeting.**

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459 Off Record: 3:02 p.m.

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462 Respectfully Submitted by:

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464 /unavailable/

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466 \_\_\_\_\_  
Tracy Wiard Date

467 Licensing Examiner

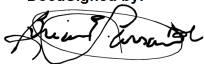
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Approved by:

DocuSigned by:  
 5/3/2023  
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Dr. Brian Larson Date

Alaska State Board of Chiropractic Examiners