

Comments of Gina Carucci, D.C.
Program Review and Investigations Committee
October 1, 2009

Members of the Committee:

My name is Gina Carucci and I am a licensed Doctor of Chiropractic practicing in Rocky Hill. I also serve as the legislative chair of the Connecticut Chiropractic Association.

We as an Association are pleased that you will undertake a study into how “scope of practice” decisions are made and whether a better—or more fair—structure might exist to address these issues.

I do not appear before you today to ask for any specific scope of practice change. That’s not our purpose, and I know it is not yours either. This type of review is however, long overdue.

It seems that many scope decisions are made without a full, in-depth and substantive hearing on the issue. Many times these items tend to come up and appear at the last second in “implementer” bills, or culminate in informal advice or guidance from DPH. I’m not saying that is necessarily bad—my point is there should be some clinical basis for scope changes and an appropriate review of the change requested, and I’m not sure there always is.

Chiropractic Physicians are part of the healing arts profession, along with Medical Doctors, Podiatric Physicians, Optometric Physicians, Naturopathic Physicians and several others.

Our authority is set out in statute with guidance from our regulatory agency, the Chiropractic Board of Examiners. When a scope of practice question arises, it typically is reviewed by the Department of Public Health and, on occasion, a formal Declaratory Ruling procedure is undertaken by the Board. These decisions can take years, so one issue you might consider is the time it takes for such decisions to be made. My question is, can it be expedited?

Overall, the Connecticut Chiropractic Association believes that the real test on scope decisions should relate to education, training and applicable clinical experience as well as advances in the science and art of the discipline. If we are trained and qualified to undertake certain procedures, we believe we should be allowed to practice to that level as well.

It seems like we need to follow a statute or regulation that is broad enough to allow for the changes in technology and research, rather than having to adapt the statute or regulation to the advances in the science and technology of the healing arts.

We look forward to your study and review. If our association can provide you with material or data to facilitate your deliberations, we will be happy to do so.

Thank you.