

**Commonwealth of Massachusetts
Bureau of Health Professions Licensure
Board of Registration of Chiropractors
250 Washington Street
Boston, MA 02108**

Public Meeting Minutes

September 4, 2025

A public meeting of the Massachusetts Board of Registration of Chiropractors (the Board) was held remotely with video and audio conference as an alternate means of public access.

Attendees were informed that the meeting was being recorded.

Dr. Grosso noted a quorum of members present via video or phone and called the meeting to order at 10:12 a.m.

MEMBERS PRESENT

Dr. Joseph Grosso, Chair
Dr. Mary Connors, Secretary
Dr. Kathleen O'Malley
Dr. Janine Pulley

MEMBERS ABSENT

Dr. Jaclyn Debs

STAFF PRESENT

Lisa Guglietta, Board Executive Director
Katie Goldrick, Board Associate Executive Director
Sheila York, Esq., Board Counsel

ATTENDANCE:

Dr. Grosso took attendance by roll call and a quorum of board members was recorded with the following members present via video conference: *Grosso, Connors, O'Malley, Pulley*

APPROVAL OF AGENDA:

Dr. Grosso asked for a motion to approve the meeting agenda. Thereafter a motion was made by Dr. Pulley, seconded by Dr. O'Malley and VOTED (roll call); **to approve the September 4, 2025 agenda as drafted.**

in-favor: Grosso, O'Malley, Connors, Pulley

opposed: none

PUBLIC MEETING MINUTES

Dr. Grosso asked for a motion to approve the draft August 7, 2025 meeting minutes. Thereafter a motion was made by Dr. O'Malley, seconded by Dr. Pulley and VOTED (roll call); **to approve the public meeting minutes of August 7, 2025 as drafted.**

in-favor: Connors, Grosso, O'Malley, Pulley

opposed: none

UPDATE FROM MASS CHIROPRACTIC SOCIETY

Dr. Howard Ewert, MCS Opioid Education Director, and Tracey Lane, MCS Executive Director, provided an update on prescriber education collaboration including discussions with Boston University regarding prescriber training programs related to opioid use and management. They have been conversing with the Bureau of Substance Addiction Services (BSAS) and giving input from the chiropractic profession to Boston University's Scope of Pain program. Dr. Ewert provided information from a report published on August 25, 2025 in *Pain Medicine News*. In a study, 75% of participants who reported nonprescription opioid use said their first opioid use came from a prescription written for them (39%) or a prescription written for someone else (36%). Tracey Land and Dr. Ewert emphasized the importance of expanding patient access to alternative treatments for pain such as chiropractic.

DISCUSSION

233 CMR 5.04 (4) Criteria for Waiver of Chiropractor of Record Experience Requirement

The Chair noted that the chiropractor facility regulations are very black-and-white regarding the experience requirement for the Chiropractor of Record. The regulations allow the Board to waive the experience requirement, but do not provide guidance on circumstances in which a waiver is warranted. Paul Andrews, LMT and Mark Davini, D.C. attended the meeting to discuss their letter to the Board dated August 22, 2025 regarding the experience requirement and waiver for the Chiropractor of Record.

Paul Andrews stated that there was rigidity in the regulations, but the Board has the flexibility to grant a waiver. In their letter, Dr. Davini and Mr. Andrews note that individually licensed chiropractors are already subject to the regulations and oversight of the Board and can practice without demonstrating four years of experience when opening a solo practice. As a solo practice, the individual licensee is their own Chiropractor of Record. The ownership of chiropractic facilities by individuals that were not licensed chiropractors created the need for a facility license. A mechanism was needed to bring unlicensed individuals into the oversight and regulatory authority of the Board. Mr. Andrews asked the question of why does placing two or more individually licensed chiropractors in the same practice created a public safety issue? A more stringent approach would be needed for chiropractic facilities that have non-licensee ownership. The Chiropractor of Record for a facility with a non-licensee owner should have the required experience. Dr. Davini and Mr. Andrews asked the Board to consider policy guidance for licensees as they maintain that the four years of experience requirement for licensee owners is an unnecessary barrier for businesses.

Board Counsel, Sheila York, noted that the Chiropractor of Record requirement comes from the statute. The Board must have criteria to make consistent decisions with waivers. Facility ownership would need to be looked into for such concerns as marketing companies or other influences behind the scenes. Dr. O'Malley commented on the Pharmacy Board's petition for a

waiver that includes a statement of policies and procedures that are in place to protect the public's health and welfare. Dr. O'Malley noted that the Board's policy could include the petitioner to answer questions about funding, marketing, and ownership. A compliance program could also be considered as a requirement for the waiver. Attorney York stated that she and the Executive Director would draft a policy based on the opinions shared by the Board today. Board members may email their input separately to staff, but not to other board members. The Board then gave staff direction to draft a policy on the criteria for a waiver of the Chiropractor of Record experience requirement.

ADJOURNMENT

At 10:53 a.m. a motion was made by Dr. O'Malley, seconded by Dr. Pulley and VOTED (roll call); **to end the public session and go into closed executive session per *G.L. c. 30A, § 21(a)(1)* for the purpose of discussing the reputation, character, physical condition, or mental health, rather than professional competence, of an individual, or to discuss the discipline or dismissal of, or complaints or charges brought against, a public officer, employee, staff member or individual. Specifically, to evaluate the Good Moral Character as required for registration for a pending applicant.**

in-favor: Connors, Grosso, O'Malley, Pulley

opposed: none

Respectfully submitted,

Lisa M. Guglietta, Executive Director
Board of Registration of Chiropractors

Documents used by the Board during open session:

- *Posted agenda 9/4/2025*
- *Draft public meeting minutes of 8/7/2025*
- *Letter dated 8/22/2025 from Paul Andrews, LMT and Mark Davini, D.C. regarding Experience Requirement and Waiver for the Chiropractor of Record*