


Jordan, Sonia (DPL)

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**From:** Termine, Joann (DPL) [Joann.Termine@MassMail.State.MA.US]  
**Sent:** Wednesday, June 10, 2015 6:38 PM  
**To:** Jordan, Sonia (DPL)  
**Subject:** FW: Rescinding, revising of non-essential or unnecessary regulations  
**Attachments:** CME Revisions 2.0.docx

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**From:** Thomas SULLIVAN [mailto:tsullivan@mbrc.org]   
**Sent:** Wednesday, June 10, 2015 6:37:51 PM  
**To:** Termine, Joann (DPL)  
**Cc:** Dan REIDA, D.C.  
**Subject:** Rescinding, revising of non-essential or unnecessary regulations  
**Auto forwarded by a Rule**

Daniel REIDA, D.C.  
Secretary, 'MBRC'  
Division of Professional Licensure  
1000 Washington Street, Suite 710  
Boston, Massachusetts 02118-5100

Dear Secretary REIDA:

I presented some ideas based at the public hearing on 04 June on the Governors order to rescind or revise unnecessary and non-essential regulations. I commented that parts of the continuing education regulations are *unnecessary* and *non essential*. Here attached is a revised version of my blathering. Pick and choose what fits best with the Governor's intent at slimming down administrative laws.

Of particular note is the recommended removal prior approval moving to audit acceptance of courses after the fact. I also suggest that you may permissibly delegate standards to the chiropractic entity nominated and specified by the Massachusetts General Court, or the DPL/ DPH and other USOE institutions for health care professions. The latter would apply to in-state courses leaving other entities for courses taken outside of the Commonwealth.

Your truly,

Thomas S. SULLIVAN, D.C.