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Sent: Wednesday, July 15, 2026 10:39 AM
To: DCA, ChiroInfo@DCA
Subject: Written Comment for Agenda Item 10 – Continuing Education Fees, Requirements, and Approval Process

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Dear Members of the Board,

Please accept this as a written comment for Agenda Item 10.

I appreciate the Board's work in reviewing continuing education requirements and approval process. I would like to raise one specific concern involving **on-demand asynchronous online courses**.

My concern is simple: in some on-demand online CE courses, a doctor may be able to receive credit without meaningful proof that the course was actually completed as intended.

This is not a content issue. It is a delivery issue.

A provider may be approved, and a course may be approved, but that still does not mean the online system is truly verifying that the doctor watched the course, spent the required time, completed it personally, and passed a meaningful assessment.

In my review of approved on-demand online courses, I identified multiple instances where these safeguards were clearly inadequate or entirely absent, raising serious concerns about whether meaningful participation and completion are being verified.

As the Board reviews continuing education requirements and approval process, I respectfully ask that it consider whether **on-demand asynchronous online courses** should require independent third-party verification of delivery compliance before they are approved or accepted for credit.

This would not replace provider approval. It would add a separate layer to make sure the online delivery system itself is doing what it is supposed to do.

I would be glad to provide any additional information if helpful, and I would welcome the opportunity to speak on this issue at a future meeting if appropriate.

Thank you for your time and consideration.

Respectfully,

Dr. Guy Annunziata

