

arguably contemplate a lifetime grant of a license, which does not expire on the renewal date. This interpretation reflects the philosophy and practice of the Board.

The present law requires the applicant to pay a renewal fee and submit a renewal application to obtain a renewal certificate. The present law does not indicate that the license expires if not renewed. Present Art. 43, § 506 makes practicing without obtaining a renewal certificate grounds for possible -- not automatic or mandatory -- suspension or revocation. This fact reinforces the interpretation that the license continues in effect. On the other hand, the present law uses mandatory language when establishing the renewal fee and also gives the Board the power to establish mandatory continuing education requirements "... as a condition to having their licenses renewed ...". In practice, the Board treats the unexpired license as valid until further action is taken by the Board. If the licensee fails to renew on or before September 1, the Board notifies the licensee again and then begins a disciplinary action.

Similarly, a licensee who fails to comply with the continuing education requirements is not eligible to renew a license, and does not receive a renewal certificate. If the licensee continues to practice, the Board begins a disciplinary action. See Art. 43, § 506(a), which now appears as § 3-310 of this title. The practice of the Board consistently reflects a view of the license as a continuing entitlement.

The distinctive nature of this title is called to the attention of the General Assembly.

Relationship of practice of chiropractic to the practice of physical therapy.

Under the present law, a chiropractor may be licensed by the State Board of Chiropractic Examiners to practice chiropractic with the "right to practice physical therapy". The relationship of the practice of chiropractic to the practice of physical therapy is complex.

Chiropractic has been a regulated profession since 1920, and chiropractors, as part of the practice of chiropractic, always have used certain of the techniques that later came to be known as "physical therapy". See, for example, the reference to diagnosis and to manual manipulation of parts of the body in § 3-101(f) of this title.

When a board to regulate the practice of physical therapy was established by Ch. 906, Acts of 1947, the relationship between the practice of "physical therapy" and "chiropractic" was recognized in the new subtitle. Art. 43, § 514 (present § 614), stated that the subtitle was not to "be construed to amend the laws relating to the practice of