

chiropractic ... or to prohibit chiropractors from practicing physical therapy in their practice as chiropractors...". This same legislation also contained a section that stated that physical therapists licensed under the physical therapy subtitle, and no other, shall be known as physical therapists and entitled to use related designations.

The Court of Special Appeals has held that a chiropractor who holds a license to practice chiropractic with the right to practice physical therapy is competent to testify in the area of physical therapy. Elliott v. Patterson, 12 Md. App. 341 (1971). Footnote No. 2 at page 345 of the same case noted:

"Long prior to the creation of the Board of Physical Therapy Examiners, chiropractics engaged in the practice of physical therapy. The obvious purpose of Section 614 was to assure the chiropractic profession that it would not be subject to licensure control by any Board other than its own."

In this regard, see also Thomas v. Owens, 28 Md. App. 442 (1975).

Ch. 704, Acts of 1949 required that in order to obtain a license to practice chiropractic "with the right to practice physical therapy", chiropractors must be examined on the subject of physical therapy as that term was defined in the physical therapy subtitle. Therefore, after 1949, two types of practice of chiropractic were permitted -- both of which involve doing acts that constitute "physical therapy".

Although it is not clear exactly which acts of physical therapy are included in the practice of chiropractic and which additional acts are included in the definition of "practice physical therapy" in § 13-101 of this article, the latter definition includes many methods of treatment beyond the manual manipulation techniques that traditionally have been the focus of the practice of chiropractic.

The Commission to Revise the Annotated Code of Maryland has attempted to preserve accurately the meaning of the present law. The General Assembly may wish to consider whether clarification of the two types of practice of chiropractic is necessary.

Miscellaneous.

Most of the present law that relates to chiropractors was enacted by Ch. 666, Acts of 1920, and substantial style changes were necessary in the revision.

There are two instances in which archaic references to "schools" of chiropractic are made: present Art. 43, § 511