



WASHINGTON STATE
CHIROPRACTIC QUALITY ASSURANCE COMMISSION
MEETING MINUTES

February 13, 2014 – 9:00 a.m. to 5:00 p.m.

Department of Health (DOH)
Town Center Two Building, Room 158
111 Israel Road SW
Tumwater, WA 98501

Commission Members:

Gabe (Gary) Smith, DC, Chair, Matthew Waldron, Vice-Chair, Harold Rasmussen, DC. David Folweiler, DC, Matthew Waldron, DC, Aaron Chan, DC, James Slakey, Public Member, Winfield Hobbs, DC, Ron Rogers, DC, Doug Long, DC, Robert Schmitt, DC, Bryson Langel, DC; (absent), Ronwynn Pratt, DC, Judy Colenso, Public Member, and Louise Stephens, Public Member.

Commission Staff Present

Leann Yount, Program Manager
Bob Nicoloff, Executive Director
Lilia Lopez, Assistant Attorney General (AAG)
Patrick Hanley, DOH Staff Attorney
Mike Ellsworth, DOH Supervising Staff Attorney
Kyle Karinen, DOH Staff Attorney

Others Present

Suzanne Becker, AAG
Daniel Baker, AAG
Tom Graham, AAG

On February 13, 2014 the Chiropractic Quality Assurance Commission (Commission) met in Tumwater Washington at 111 Israel Road SW – Town Center Two Building, Room 158. In accordance with the Open Public Meetings Act, the revised meeting agenda was e-mailed to members of the Commission’s listserv.

OPEN SESSION – February 13, 2014 **9:00 a.m.**

1. CALL TO ORDER – Dr. Smith, DC, Chair **9:00 a.m.**

1.1 The agenda was approved with the following additions:

- Item 1.3 – Name Tags
- Item 10.6 – Priority #2 – Draft Newsletter Review
- Item 10.8 Priority # 2 – Rule Review

1.2 The December 12, 2013 business meeting and January 28, 2014 Pilot Committee meeting minutes were approved.

1.3 Message from the Chair to include:

- Welcomed Judy Colenso, Public Member to the commission. Ms. Colenso is replacing Patrick Espana's position. She has been a paralegal in Spokane for 30 years.
- An informal meeting of representatives of the Medical, Nursing, and Chiropractic Commissions meeting was held on January 22, 2014. The commissions provided an update about their pilots and programs.
 - Common concerns are the indirect costs and the desire to control or reduce the spending. There are also questions as to whether the existing information technology (IT) infrastructure can meet the needs of the commissions.
 - There is a desire for DOH units that provide services to commissions to be more accountable for their performance measures through the establishment of bench marks.
 - The goal is to control spending, while improving services, without jeopardizing public protection.
 - Medical Commission's draft Operating Agreement has been given to the DOH.
- An Independent Chiropractic Examination (ICE) letter of concern was received from trial attorney Scott Blair. He works closely with a lot of chiropractic patients. The letter talks about his experience with ICEs and problems he perceives with some of the ICEs, including negative impacts on the patient and profession.
- Name tags will be ordered for commissioners to wear while representing the commission at meetings.

2. SHB 1518 PILOT PROJECT PLANNING COMMITTEE UPDATE – Dr. Waldron 9:15 a.m.

2.1 Dr. Waldron briefly discussed the January 22, 2014 Pilot Committee meeting. The Pilot Committee and Workgroups are meeting and gathering information. Updates will be provided at the commission meetings.

2.2 Bob Nicoloff, Executive Director provided the following Pilot Project update:

- Moves:
 - Program Manager, Leann Yount moved to the second floor. Mr. Nicoloff and Ms. Yount are now co-located making it easier to conduct business
 - The vacant support position also has a cubicle ready for them.
- Staffing:
 - Mr. Nicoloff is working with the Human Resource Office to finalize the support position's job description.
 - Hope to have the support position filled by the April 10, 2014 meeting.

- Pilot Workgroups Update:
 - Administrative
 - Mr. Nicoloff and Ms. Yount met with the Administrative Workgroup and reviewed performance measures and the budgets for the Credentialing and Public Disclosure sections.
 - Identified questions and request items for the next meeting.
 - Budget
 - The Budget Workgroup, Mr. Nicoloff, and Ms. Yount met with the DOH Budget Director Steve Hodgson and Finance Officer, Jeff Orwig. Prior to the meeting, the DOH staff received a list of questions and items the workgroup was seeking answers to. The items were addressed. The DOH will work with program staff to create different budget reports that are easy to read.
 - Investigations
 - The Investigative Workgroup, Mr. Nicoloff, and Ms. Yount met with the DOH Investigation Office Director Dave Magby, Supervising Investigator Don Painter and Disciplinary Case Manager, Tammy Kelley. Prior to the meeting, the DOH staff received a list of questions and items the workgroup was seeking answers to. The items were addressed. The Investigation Unit will work with program staff to develop new case status reports and hold meetings to monitor investigation activities. The target is to complete investigations within 170-days.
 - Disciplinary
 - The Disciplinary Workgroup had to reschedule their meeting. They will meet with Mr. Nicoloff and Ms. Yount on February 27, 2014 and review performance measures and create a list of items for their next meeting with the DOH.
- Jurisprudence (JP) Examination
 - Updates are being made to the examination questions.
 - We expect the examination will be online in April.
 - Question was raised – Can a fee be charged for the JP exam in disciplinary cases that require the respondent to take and pass the JP exam?
 - Program manager will ask the AAG if this is allowed.
- Chiropractic Website
 - Both the Nursing and Medical Commissions have their own separate websites away from the DOH professions. They have control over most of the way their website looks and what is being added to it.
 - The Chiropractic Commission can likely also have their own website. Mr. Nicoloff asked the commission if they interested in doing this too.
 - Ms. Yount will send the Medical, Nursing, and Chiropractic website links to the commission members for their comment/suggestions. Comments will be presented during the April 10, 2014 meeting.

- Letter of Recommendation
 - The Nursing Commission was nominated for a national award. The Chiropractic Commission provided a letter of recommendation.

3. DEPARTMENT OF HEALTH LEGISLATIVE MEET-ME CALLS – Dr. Chan 9:30 a.m.

3.1 Dr. Chan provided a brief update about the DOH’s weekly legislative meet-me calls.

Lori Grassi, Executive Director from the Washington State Chiropractic Association (WSCA) was also present and provided an update about their legislative activities, as follows:

- [HB2105](#) – Transparency in Government by Requiring Public Agencies with Governing Bodies to Post their Agendas Online in Advance of the meeting.
 - This is, and has been, a standard practice for the commission.
- [HB2139](#) – Creating a Quality Improvement Program for the Licensees of the Medical Commission.
 - Similar to the Nursing Commission’s Early Remediation Rules concept.
- [HB2338](#) – Requiring a Rule-Making Process to Change the Scope of Practice of a Healthcare Profession.
 - Would no longer allow for Interpretive Statements or adding items to the Classification of Chiropractic Procedures and Instrumentation List without going through rule-making.
- [HB2742](#) - Requiring a Rule-Making Process to Change the Scope of Practice of a Healthcare Profession.
 - Same bill as HB2338.
- [HB2315](#) – Concerning Suicide Prevention.
 - Will require mandatory training/continuing education.
- [HB2351](#) – Concerning the Practice of Out-of-State Healthcare Professionals Volunteering in Washington.
- [HB2160](#) – Allowing Physical Therapists to Perform Spinal Manipulation
 - This bill will probably pass this session. However, the required training and certification is much higher than in the past session bills. Both state associations have worked very hard to come up with a compromise that they can agree on.
- [SB6304](#) – Preserving Patient and Practitioner Freedom to Obtain and Provide Healthcare by Prohibiting Unfair and Deceptive Practices in Contracting for and Managing Healthcare Delivery Under Health Plans.
- [SB6407](#) – Consenting to Medical Care by a Minor.

4. NATIONAL BOARD OF CHIROPRACTIC EXAMINERS (NBCE) AND FEDERATION OF CHIROPRACTIC LICENSING BOARDS (FCLB) DELEGATE AND ALTERNATE 9:45 a.m.

- 4.1** FCLB is holding their annual Connecting Regulators conference on April 30, 2014 - May 4, 2014 in Myrtle Beach, South Carolina. Commission members voted for Dr. Rasmussen to represent Washington State as the delegate and Dr. Pratt as the alternate-delegate.

NBCE is also holding their annual business meeting of state delegates on Friday, May 2, 2014 in conjunction with the FCLB conference. Commission members voted for Dr. Rasmussen to represent Washington State as the delegate and Dr. Pratt as the alternate-delegate.

Commission members also requested that Mr. Nicoloff and Ms. Yount attend the conference.

5. NATIONAL BOARD OF CHIROPRACTIC EXAMINERS (NBCE) PART IV EXAM

- 5.1** NBCE is requesting two chiropractic commission members to assist with administering two Part IV Practical Examinations. The commission delegated two commissions to assist as follows:

- Spring Part IV Exam – May 16, 17, and 18, 2014
 - Dr. Smith
 - Dr. Pratt
- Fall Part IV Exam – November 14, 15, and 16, 2014
 - Dr. Folweiler
 - Dr. Hobbs
 - Dr. Waldron (alternate)

NBCE is also requesting one chiropractor to participate in the June 6 and 7, 2014 Part IV Test Committee meeting. Commission members discussed and decided Dr. Chan will represent Washington. Dr. Folweiler is the alternate.

6. DIAGNOSTIC ULTRASOUND (DU) PRESENTATION – Mark Woodham, DC and Christopher Wellwood, DC 10:00 a.m.

- 6.1** Dr. Woodham and Dr. Wellwood presented information about diagnostic ultrasound (DU) for musculoskeletal application and Pulsed Electromagnetic Fields (PEMF). The presentation was a formal request to add DU for musculoskeletal application and PEMF to the Classification and Instrumentation and Procedures List.

After hearing the presentation and a brief question/answer period, the commission decided to send the request to the Instrumentation and Procedures/Standard of Care Committee for further review and consideration. The presenters were informed that the commission is in the process of reviewing their classification procedure. The committee may not be able to make a recommendation to the commission at this time. However, they will review the presentation and the information submitted.

7. **CLASSIFICATION OF CHIROPRACTIC PROCEDURES AND INSTRUMENTATION LIST (List) – Electrocardiogram (EKG/ECG)**

10:30 a.m.

7.1 Dr. Waldron outlined that he will start the discussion and Lilia Lopez, AAG will continue it and provide the infrastructure, as follows:

- In 2011, the National Board of Chiropractic Examiners conducted a scope-of-practice survey of the states.
- In September 2013, an inquiry received from an out-of-state chiropractor insisting EKGG/ECGs were on the approved list before and wondered why it was removed.
- In October 2013, the Instrumentation of Procedures/Standard of Care Committee reviewed and discussed EKG/ECGs and [RCW 18.25.005](#). The committee considered the use of EKG/ECG for differential diagnosis. It was determined that EKG/ECG met the requirements of [WAC 246-808-505](#) and that it falls under the scope-of-practice.
 - Committee members reported to the full commission and recommended that it be added to the approved List.
- On December 12, 2013, the commission reviewed the committee's recommendations and discussed RCW 18.25.005 and chiropractors use of EKG/ECGs for differential diagnosis.
 - The commission voted 12 in favor, and one member opposed, to add EKG/ECG to the approved list. One member was absent for the vote.

The rationale included:

- EKG/ECG devices can be used as part of a chiropractic differential diagnosis to serve the public by providing greater access to health care. For example, the chiropractor may practice in a rural area where they are the closest access point to healthcare.
- A chiropractor is required to perform a physical examination on every patient. If the chiropractor finds a concern or condition that falls outside of the chiropractic scope-of-practice, the patient can be referred to another healthcare provider.
- University of Western States and Life West Chiropractic Colleges were contacted. They verified that the EKG/ECG fundamentals are taught in the chiropractic colleges and competency is obtained in the construct of providing a differential diagnosis.
- The National Board of Chiropractic Examiners (NBCE) also verified that EKG/ECG fundamentals are covered in their exam.

- In January 2014, during a legislative hearing in the House Health and Wellness Committee for [HB 2338](#), the Chiropractic Commission’s approval of EKG/ECGs was noted.
- In the beginning of February 2014, the commission received a letter from a current commission member addressing his concerns with having EKG/ECGs on the approved List.

The commission will review the listing process and consider making improvements to the process.

7.2 Ms. Lopez discussed the legal framework. The commission followed the protocol outlined in [WAC 246-808-505](#) when they reviewed and added EKG/ECG to the approved List at the December 12, 2013 meeting. It was not added as an expansion to the scope-of-practice. She also suggested that rule-writing may be a better solution when adding items to the List.

7.3 The commission revisited the issue of including EKG/ECGs on the List. A motion was made to vote and remove EKG/ECG from the List until a better review process is created.

After further discussion ensued, the motion was amended to not remove EKG/ECG from the List but to keep it on the List and add qualifying language to the approved Diagnostic Equipment and Analytic Techniques section, to read:

Diagnostic Equipment & Analytic Techniques: The Commission does not endorse any specific company or product. Below is a list of categories of “diagnostic equipment *utilized for differential diagnosis and appropriate referral for non-neuromusculoskeletal conditions.* Following each title are examples of equipment:”

In addition, the commission also wanted the Instrumentation and Procedures/Standard of Care Committee to assess the need for certification and training. They may also make other recommendations.

The motion and vote also included that this item be placed on the April or June meeting agenda for a commission vote.

The commission voted 12 in favor, and one abstained, to approve the new description of the “Diagnostic Equipment and Analytic Techniques List” and to send this to the committee for a thorough review and documentation.

8. NEW BUSINESS REQUESTED FROM DECEMBER 12, 2013 MEETING 11:00 a.m.

8.1 Lilia Lopez, AAG gave a PowerPoint presentation on Mandatory Reporting. [WAC 246-808-660](#), [670](#), [680](#), [685](#), [690](#), and [695](#) are specific to chiropractic mandatory reporting. However, chiropractors and other healthcare providers must also follow [Chapter 246-16 WAC](#).

Ms. Lopez will also draft a Mandatory Reporting newsletter article for a future publication.

8.2 Commission members reviewed the Federation of Chiropractic Licensing Boards Power Poll results on Medical Malpractice Insurance and other states requirements. Not all states require it. [WAC 246-808-190](#) only requires it to be a commission approved preceptor.

- 8.3** A draft Outreach Education PowerPoint presentation was provided to the commission. Dr. Smith briefly discussed it. The goal is to provide outreach and be a resource to chiropractors. The presentation can be conducted live, as a webinar, and/or be placed on the chiropractic website.

The Communications Committee will review the draft and continue to tweak it. They will also decide how to best offer it:

- Live seminar
- Webinar
- Post it on the chiropractic website

9. MOCK DISCIPLINARY AUDIT CASE REVIEW – Dr. Waldron 11:30 a.m.

- 9.1** Dr. Waldron presented a [documentation of care](#) exercise for training purposes. Due to time limitations, the training was cut short. It will resume at a future meeting.

LUNCH - Commission members continued meeting through lunch. 12:00 p.m.

10. CHIROPRACTIC QUALITY ASSURANCE COMMISSION COMMITTEES 12:30 p.m.

10.1 Planning/Executive Committee:

Members include: Gabe Smith, DC, Chair, Matthew Waldron, DC, Vice-Chair, Harold Rasmussen, DC, Immediate Past Chair, and Jim Slakey, Public Member

Priority #1

- Mr. Nicoloff provided an update to committee members about the newly created position for support staff.
 - Working with Human Resources to finalize the position descriptions for Ms. Yount and the new position.
 - Have to change Ms. Yount's position description because the new position will report to her. This will be a new requirement for her position.
 - Will have the new position filled by the April 10, 2014 meeting.
- The committee discussed ways to assist Ms. Yount with workload until the support staff position is filled. One avenue to save money with printing and postage costs, as well as program manager time, is to email the agenda items and not print and mail meeting packets.
 - It was decided that the April 10, 2014 meeting packets will be emailed to the commission and not printed and mailed.
 - A wifi hot spot will be available at the meeting.
 - Commission members are encouraged to bring laptops or I-pads to electronically access the agenda items.
 - The items will also be displayed on the projection screens for commission members, staff, and audience members to see and follow along.

10.2 Budget Committee:

Members include: Jim Slakey, Public Member, Chair, Gabe Smith, DC, Matthew Waldron, DC, Harold Rasmussen, DC, and Winfield Hobbs, DC

Priority #1

- Committee members reviewed the budget report and will make recommendations to the commission as the Pilot Budget Workgroup identifies them.

10.3 Instrumentation and Procedure/Standard of Care Committee:

Members include: Win Hobbs, DC, Chair, Doug Long, DC, Ron Rogers, DC, Ronwynn Pratt, DC, and David Folweiler, DC

Priority #1

- Committee members reviewed the use of Essential Oils and the chiropractic scope of practice. They recommended that this be placed on the April 10, 2014 meeting agenda for public comment prior to a decision being made that will classify this item for the List.

Priority #2

- Committee members discussed concepts and creating a standardized process for reviewing items. They will continue developing a checklist and decision paper during the April 10, 2014 meeting.

Priority #3

- Due to time constraints, the committee members deferred reviewing the DU and PEMF presentation and information to see if they fall under the scope-of-practice to the April 10, 2014 meeting.

10.4 Research Committee:

Members include: Bryson Langel, DC, Chair, Aaron Chan, DC, Judy Colenso, Public Member, Robert Schmitt, DC, and Louise Stephens, Public Member.

Priority #1

- Committee members reviewed the disciplinary matrix statistics. They didn't suggest any changes. It was reported that the layout and statistics are helpful and easy to read.

Priority #2

- Committee members reviewed the chiropractic list/labels criteria worksheet along with [RCW 42.56.070 \(9\)](#). They reported, for consistency purposes, and to free up Ms. Yount from duplicative work, the commission will start using the department's application for list/labels requests.

Ongoing

- Committee members reviewed the following list and label request:
 - Diligent Medical Billing Services – Requesting list/labels to be used to obtain names of chiropractors in the Puget Sound area to introduce the company and offer their medical billing services.
 - The committee did not find Diligent Medical Billing Services to be a professional association and voted unanimously to deny this request.

10.5 Continuing Education/Continued Competency/State Examination Committee:

Members include: Aaron Chan, DC, Chair, Bryson Langel, DC, Win Hobbs, DC, Louise Stephens, Public Member, and David Folweiler, DC

Priority #1

- Committee members reviewed Bob Nicoloff's jurisprudence (JP) exam editorial suggestions for the online JP exam. They recommended to the commission that Mr. Nicoloff continue editing the exam for the online format. The commission voted for Mr. Nicoloff to continue editing the exam and making it available online.

Ongoing:

- Committee members didn't have any JP exam comments to review.

10.6 Communications Committee:

Members include: Doug Long, DC, Chair, Judy Colenso, Public Member, Robert Schmitt, DC, Ronwynn Pratt, DC, and Vacant DC

Priority #1

- Committee members continued reviewing drafted articles as well as continue working on drafting future articles to include:
 - Records Retention – [WAC 246-808-650](#) and [RCW 70.02.160](#) – Dr. Long
 - Oxygen usage – Dr. Long
 - Performance measures – Bob Nicoloff.
 - Responsibility of a Retiring Chiropractor – Re-assigned to Judy Colenso
 - Audits
 - Medical Cannabis ([ESSB 5073](#))
 - Retiring From Practice – Judy Colenso
 - Independent Medical Examination Interpretation
 - Mandatory Reporting – Lilia Lopez, AAG

Priority #2

- Committee members reviewed the draft January – March 2014 newsletter. Edits were made to the draft. The committee recommended the commission approve the newsletter with the edits. The commission voted to approve the newsletter. Ms. Yount will send it to the chiropractic listserv and post on the website.

Articles Under Review:

- Washington Health Professional Services– John Fuhrman, Executive Director
- Complaint Allegation Statistics – Leann Yount/Louise Stephens

Ongoing:

- Summary of disciplinary cases – Leann Yount

Priority #3

- Committee members reviewed the draft Outreach Educational PowerPoint. They made additional edits. It was suggested that the Washington State Chiropractic Association be contacted to see if we can give the presentation during some future WSCA outreach events. There are many associations around the state that may also be interested in the presentation.

10.7 Pilot Committee:

Members include: Matthew Waldron, DC, Chair, Jim Slakey, Public Member, Ron Rogers, DC, Harold Rasmussen, DC, and Gabe Smith, DC

Priority #1

- Committee members didn't meet but provided a Pilot Workgroup progress report under agenda item 2.

10.8 Rules Committees Panel A:

Members include: Harold Rasmussen, Chair, Winfield Hobbs, DC, Robert Schmitt, DC, Gabe Smith, DC, Bryson Langel, DC, David Folweiler, and Jim Slakey, Public Member

Priority #1

- Committee members reviewed the DOH comments on the draft CR101 regarding the Early Remediation rules. They recommended the commission accept the edits.

The commission voted to accept the edits. Ms. Yount will make the edits and move forward with the rule.

Priority #2

- Committee members reviewed the DOH comments on the draft CR101 regarding WAC 246-808-545- Improper Billing. They recommended the commission accept the edits.

The commission voted to accept the edits. Ms. Yount will make the edits and move forward with the rule.

10.9 Rules Committees Panel B:

Members include: Ron Rogers, DC, Chair, Aaron Chan, DC, Doug Long, DC, Matthew Waldron, DC, Ronwynn Pratt, DC, Judy Colenso, Public Member, and Louise Stephens, Public Member

Priority #1

- Committee members reviewed the new draft WAC 246-808-550 – Future Care Contract language. They had questions and needed to do a bit more research. This item will be placed on the April 10, 2014 agenda for further review.

Priority #2

- Committee members reviewed the new draft WAC 246-808-150 – Continuing Education language for the CR102. They recommended the commission accept the edits.

The commission voted to accept the edits. Ms. Yount will make the edits and move forward with the rule.

11. COMMITTEE REPORTS 2:30 p.m.

11.1 Committees reported out to the commission about their committee work. Some items were presented as status updates and others were presented for consideration. See the full report under agenda item 10.

12. MANAGEMENT REPORT – Bob Nicoloff, Executive Director and Leann Yount 3:00 p.m.

12.1 Mr. Nicoloff reported the legislative update was thoroughly covered under agenda item 3.

12.2 Mr. Nicoloff reported that he and Dr. Rasmussen attended the February 2013 WSCA’s annual board meeting. A continuing education course on Evidence Based Chiropractic was also provided. The meeting and course were good. Mr. Nicoloff will ask if he can obtain and share the PowerPoint presentation with the commission.

12.3 Other relevant items, as follows:

- Mr. Nicoloff shared with the commission that Ms. Yount was asked to co-chair the April 30, 2014 Chiropractic Board Administrators Committee meeting and to assist in throughout 2014/2015.

Mr. Nicoloff explained that this is a great opportunity for Ms. Yount and asked the commission for approval. They voted to have Ms. Yount co-chair the Chiropractic Board Administrators Committee meeting.

13. NEW BUSINESS

13.1 Commission members requested the following items for the next meeting agenda:

- Multi-level marketing and fee splitting for vitamins and nutritional supplementation that chiropractors’ sell in their offices. – Dr. Hobbs
- Bylaw amendments – Dr. Smith and Lilia Lopez, AAG

14. PUBLIC COMMENT 3:20 p.m.

14.1 Three members of the public addressed the commission under item 3 and 6.

15. CONSENT AGENDA

Items listed under the consent agenda were approved by a single motion of the commission without discussion. If discussion was needed, that item would've been moved and placed on the business agenda for discussion.

15.1 December 2013 issue of "The Sentinel News for Department Employees."

15.2 Chiropractic and chiropractic x-ray licensing statistics as of January 2014.

16. COMMISSION ADJOURNMENT

3:30 p.m.

Next Business Meeting:

April 10, 2014
Department of Health
Point Plaza East building, Rooms 152/153
Tumwater, WA 98501

Prepared By: Leann Yount, Program Manager

Date

Approved By: Gary "Gabe" Smith, DC, Chair

Date

Licensing Statistics as of February 7, 2014

Chiropractic X-ray Technicians

Nov 26, 2013 Feb 7, 2014

Total Active Licenses	205	214
Total Pending Licenses	13	7
Expired in Renewal <small>(expired more than 1 year since last renewed)</small>	56	50
Expired Licenses <small>(expired within 1 year since last renewed)</small>	876	887
Total Revoked	1	1
Total Suspended	3	3
Active on Probation	0	0
Active with Restrictions or Conditions	0	0

Chiropractors

Nov 26, 2013 Feb 7, 2014

Total Active Licenses	2326	2342
Total Pending Licenses	42	41
Total Inactive Licenses	180	175
Expired in Renewal <small>(expired within 1 year since last renewed)</small>	88	89
Expired Licenses <small>(expired more than 1 year since last renewed)</small>	2468	2486
Total Revoked	34	34
Total Suspended	43	43
Active on Probation	13	10
Active with Restrictions	1	1
Active with Conditions	17	14