



NOTICE OF TELECONFERENCE LICENSING COMMITTEE MEETING

Committee Members

Pamela Daniels, D.C., Chair
Janette N.V. Cruz

The Board of Chiropractic Examiners' (Board) Licensing Committee will meet by teleconference on:

**Friday, December 9, 2022
10:00 a.m. to 12:00 p.m.**
(or until completion of business)

The Committee may take action on any agenda item.

Teleconference Instructions: The Licensing Committee will hold a public meeting via Webex Events. Pursuant to the statutory provisions of Government Code section 11133, neither a public location nor teleconference locations are provided.

To access and participate in the meeting via teleconference, attendees will need to click on, or copy and paste into a URL field, the link below and enter their name, email address, and the event password, or join by phone using the access information below:

<https://dca-meetings.webex.com/dca-meetings/j.php?MTID=mce34c786c1e3547b5e02d25ae0dc18da>

If joining using the link above

Webinar number: 2495 974 8730
Webinar password: BCE12092022

If joining by phone

+1-415-655-0001 US Toll
Access code: 249 597 48730
Passcode: 22312092

Instructions to connect to the meeting can be found at the end of this agenda.

Members of the public may, but are not obligated to, provide their names or personal information as a condition of observing or participating in the meeting. When signing into the Webex platform, participants may be asked for their name and email address. Participants who choose not to provide their names will be required to provide a unique identifier, such as their initials or another alternative, so that the meeting moderator can identify individuals who wish to make a public comment. Participants who choose not to provide their email address may utilize a fictitious email address in the following sample format: XXXXX@mailinator.com.

Note: Members of the public may also submit written comments to the Committee on any agenda item by Wednesday, December 7, 2022. Written comments should be directed to chiro.info@dca.ca.gov for Committee consideration.

AGENDA

- 1. Call to Order / Roll Call / Establishment of a Quorum**
- 2. Review and Possible Approval of October 3, 2022 Committee Meeting Minutes**
- 3. Update on Board's Licensing Program**
- 4. Review, Discussion, and Possible Recommendation Regarding the Application for New Chiropractic College Approval by Keiser University - College of Chiropractic Medicine**
- 5. Review, Discussion, and Possible Recommendation Regarding Chiropractic College Curriculum Requirements (California Code of Regulations [CCR], Title 16, section 331.12.2)**
- 6. Review, Discussion, and Possible Recommendation Regarding the Process for Licensure Through Reciprocity (Section 9 of the Chiropractic Initiative Act and CCR, Title 16, section 323)**
- 7. Review, Discussion, and Possible Recommendations Regarding the Renewal Requirements and Fees for Inactive Licenses (CCR, Title 16, sections 370 and 371)**
- 8. Public Comment for Items Not on the Agenda**
Note: Members of the public may offer public comment for items not on the agenda. However, the Committee may not discuss or take action on any matter raised during this public comment section that is not included on this agenda, except to decide whether to place the matter on the agenda of a future meeting. [Government Code Sections 11125, 11125.7(a).]
- 9. Future Agenda Items**
Note: Members of the Committee and the public may submit proposed agenda items for a future Committee meeting. However, the Committee may not discuss or take action on any proposed matter except to decide whether to place the matter on the agenda of a future meeting. [Government Code Section 11125.]
- 10. Schedule 2023 Committee Meetings**
- 11. Adjournment**

This agenda can be found on the Board's website at www.chiro.ca.gov. The time and order of agenda items are subject to change at the discretion of the Committee Chair and may be taken out of order. In accordance with the Bagley-Keene Open Meeting Act, all meetings of the Board are open to the public.

Government Code section 11125.7 provides the opportunity for the public to address each agenda item during discussion or consideration by the Committee prior to it taking any action on said item. Members of the public will be provided appropriate opportunities to comment on any issue before the Committee, but the Committee Chair may, at their discretion, apportion available time among those who wish to speak. Members of the public will not be permitted to yield their allotted time to other members of the public to make comments. Individuals may appear before the Committee to discuss items not on the agenda; however, the Committee can neither discuss nor take official action on these items at the time of the same meeting (Government Code sections 11125 and 11125.7(a)).

This meeting is being held via Webex Events. The meeting is accessible to individuals with disabilities. A person who needs a disability-related accommodation or modification to participate in the meeting may make a request by contacting the Board at:

Telephone: (916) 263-5355

Email: chiro.info@dca.ca.gov

Telecommunications Relay Service: Dial 711

Mailing Address:

Board of Chiropractic Examiners

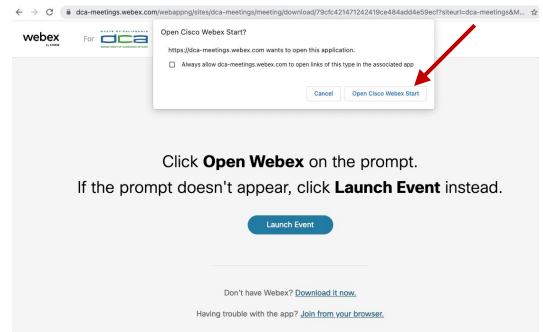
1625 N. Market Blvd., Suite N-327

Sacramento, CA 95834

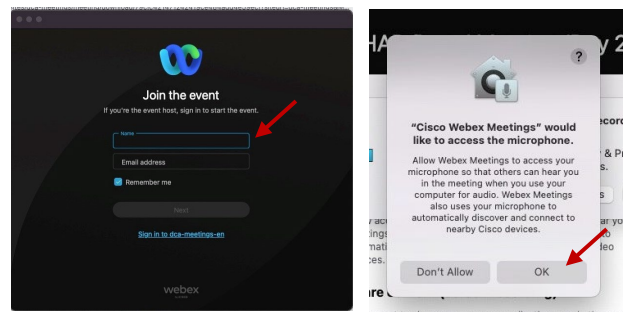
Providing your request at least five (5) business days before the meeting will help to ensure availability of the requested accommodation.

If joining using the meeting link

- 1 Click on the meeting link. This can be found in the meeting notice you received.
- 2 If you have not previously used Webex on your device, your web browser may ask if you want to open Webex. Click "Open Cisco Webex Start" or "Open Webex", whichever option is presented. DO NOT click "Join from your browser", as you will not be able to participate during the meeting.



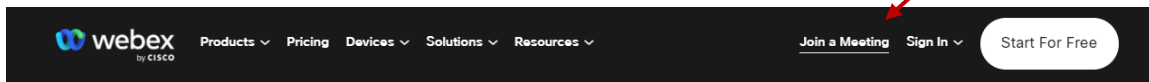
- 3 Enter your name and email address. Click "Join as a guest". Accept any request for permission to use your microphone and/or camera.



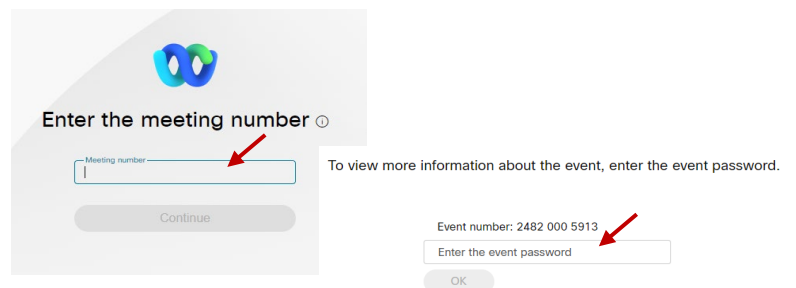
OR

If joining from Webex.com

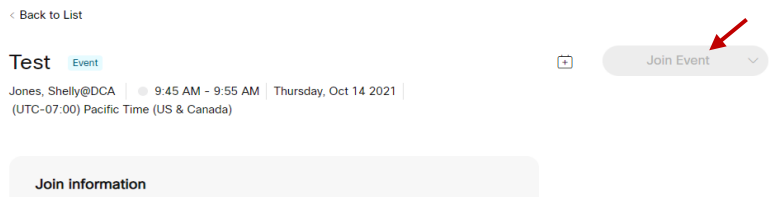
- 1 Click on "Join a Meeting" at the top of the Webex window.



- 2 Enter the meeting/event number and click "Continue". Enter the event password and click "OK". This can be found in the meeting notice you received.



- 3 The meeting information will be displayed. Click "Join Event".



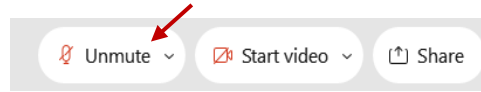
OR

Connect via telephone*:

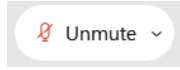
You may also join the meeting by calling in using the phone number, access code, and passcode provided in the meeting notice.

Microphone

Microphone control (mute/unmute button) is located on the command row.

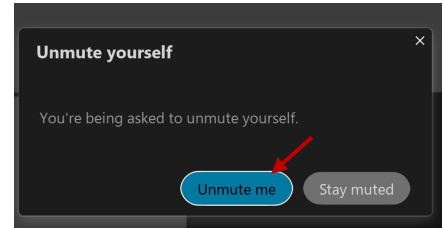


Green microphone = Unmuted: People in the meeting can hear you.



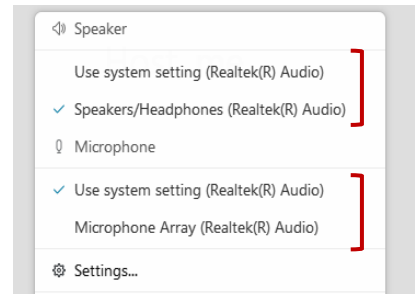
Red microphone = Muted: No one in the meeting can hear you.

Note: Only panelists can mute/unmute their own microphones. Attendees will remain muted unless the moderator enables their microphone at which time the attendee will be provided the ability to unmute their microphone by clicking on "Unmute Me".



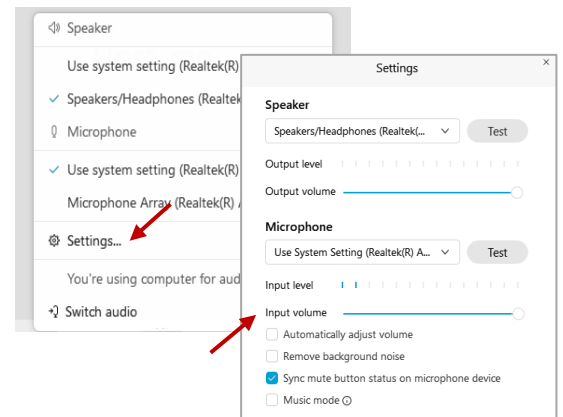
If you cannot hear or be heard

- 1 Click on the bottom facing arrow located on the Mute/Unmute button.
- 2 From the pop-up window, select a different:
 - Microphone option if participants can't hear you.
 - Speaker option if you can't hear participants.



If your microphone volume is too low or too high

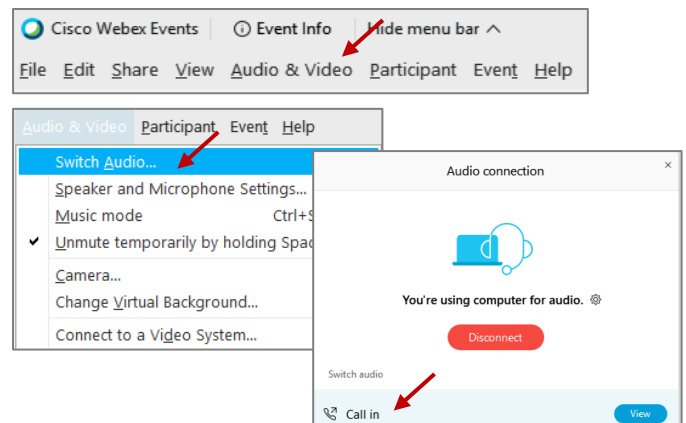
- 1 Locate the command row – click on the bottom facing arrow located on the Mute/Unmute button.
- 2 From the pop-up window:
 - Click on "Settings...":
 - Drag the "Input Volume" located under microphone settings to adjust your volume.



Audio Connectivity Issues

If you are connected by computer or tablet and you have audio issues or no microphone/speakers, you can link your phone through Webex. Your phone will then become your audio source during the meeting.

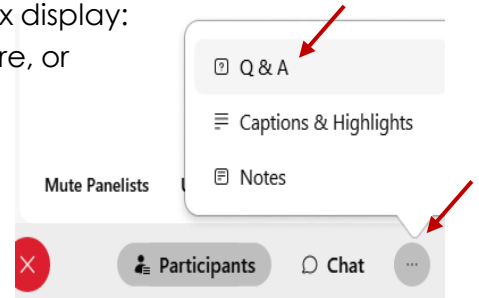
- 1 Click on "Audio & Video" from the menu bar.
- 2 Select "Switch Audio" from the drop-down menu.
- 3 Select the "Call In" option and following the directions.



The question-and-answer feature (Q&A) is utilized for questions or comments. Upon direction of the meeting facilitator, the moderator will open the Q&A panel for meeting participants to submit questions or comments. *NOTE: This feature is not accessible to those joining the meeting via telephone.*

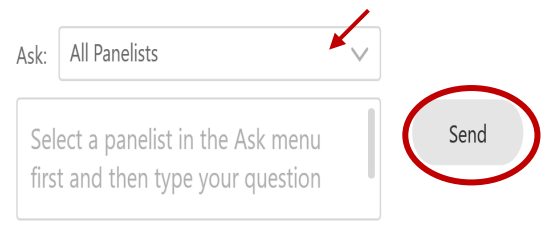
1 Access the Q&A panel at the bottom right of the Webex display:

- Click on the icon that looks like a “?” inside of a square, or
- Click on the 3 dots and select “Q&A”.



2 In the text box:

- Select “All Panelists” in the dropdown menu,
- Type your question/comment into the text box, and
- Click “Send”.



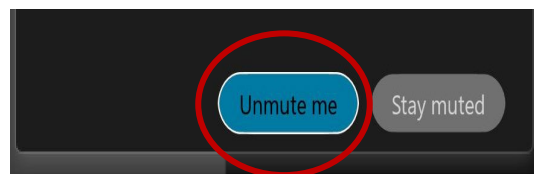
OR

If connected via telephone:

- Utilize the raise hand feature by pressing *6 to raise your hand.
- Repeat this process to lower your hand.

3 The moderator will call you by name and indicate a request has been sent to unmute your microphone. Upon hearing this prompt:

- Click the **Unmute me** button on the pop-up box that appears.

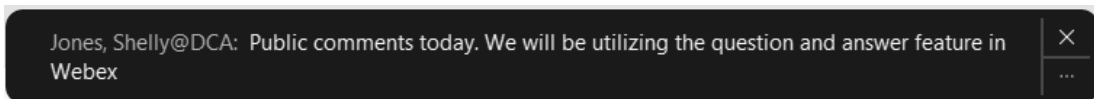


OR

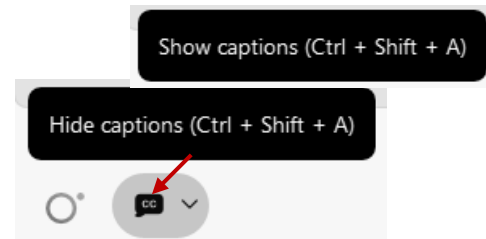
If connected via telephone:

- Press *3 to unmute your microphone.

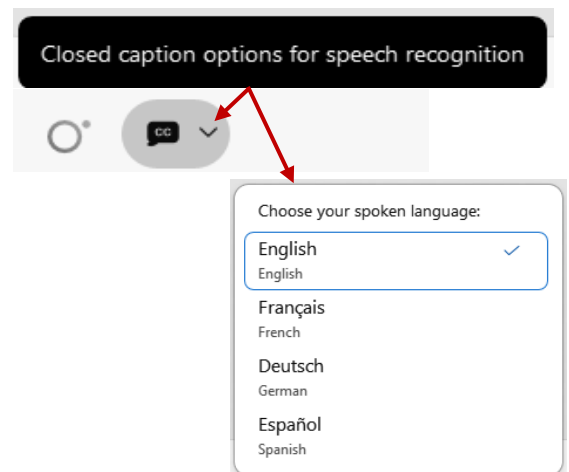
Webex provides real-time closed captioning displayed in a dialog box on your screen. The captioning box can be moved by clicking on the box and dragging it to another location on your screen.



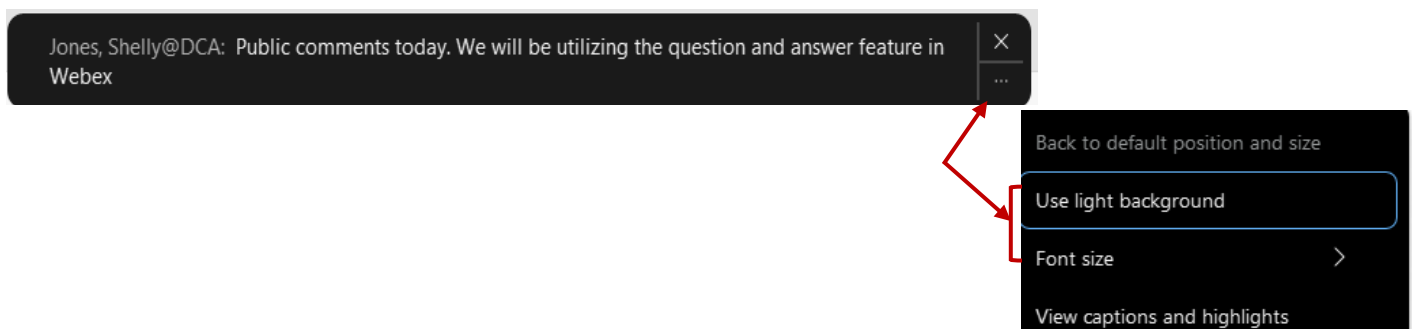
The closed captioning can be hidden from view by clicking on the closed captioning icon. You can repeat this action to unhide the dialog box.



You can select the language to be displayed by clicking the drop-down arrow next to the closed captioning icon.



You can view the closed captioning dialog box with a light or dark background or change the font size by clicking the 3 dots on the right side of the dialog box.





BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR
DEPARTMENT OF CONSUMER AFFAIRS • CALIFORNIA BOARD OF CHIROPRACTIC EXAMINERS

1625 N. Market Blvd., Suite N-327, Sacramento, CA 95834

P (916) 263-5355 | Toll-Free (866) 543-1311 | F (916) 327-0039 | www.chiro.ca.gov



**Agenda Item 1
December 9, 2022**

Call to Order, Roll Call, and Establishment of a Quorum

Purpose of the Item

Pamela Daniels, D.C., Chair of the Board's Licensing Committee, will call the meeting to order. Roll will be called by Janette N.V. Cruz.

Committee Members

Pamela Daniels, D.C., Chair
Janette N.V. Cruz



**Agenda Item 2
December 9, 2022**

Review and Possible Approval of October 3, 2022 Committee Meeting Minutes

Purpose of the Item

The Committee will review and possibly approve the minutes of the previous meeting.

Action Requested

The Committee will be asked to make a motion to approve the October 3, 2022 Committee meeting minutes.

Attachment

- October 3, 2022 Licensing Committee Meeting Minutes (Draft)



**BOARD OF CHIROPRACTIC EXAMINERS
LICENSING COMMITTEE
MEETING MINUTES
October 3, 2022**

In accordance with the statutory provisions of Government Code section 11133, the Licensing Committee (Committee) of the Board of Chiropractic Examiners (Board) met via teleconference/Webex Events with no physical public locations on October 3, 2022.

Committee Members Present

Pamela Daniels, D.C., Chair
Janette N.V. Cruz

Staff Present

Kristin Walker, Executive Officer
Dixie Van Allen, Licensing & Administration Manager
William Walker III, Enforcement Manager
Amanda (Campbell) Ah Po, Enforcement Analyst
Sabina Knight, Board Counsel, Attorney III, Department of Consumer Affairs (DCA)

1. Call to Order / Roll Call / Establishment of a Quorum

Dr. Daniels called the meeting to order at 12:00 p.m. Ms. Cruz called the roll. All members were present, and a quorum was established.

2. Update on Board's Licensing Program

Ms. Walker updated the Committee on the Business Modernization Project, also known as Connect. On July 1, 2022, the Board added functionality to the system to waive the application and initial license fees for spouses of active-duty members of the military who are assigned to a duty station in California and hold a current license to practice in another state, as required by Business and Professions Code (BPC) section 115.5. In August 2022, the Board implemented the Department of Health Care Access and Information (HCAI) health workforce data survey for licensees to complete during their electronic license renewal process, as required by BPC section 502.

Ms. Walker explained the Board is currently in the maintenance and operations phase of this project and has been focusing on system enhancements to: increase the system utilization rate by licensees; simplify the online renewal process; make the user dashboard easier and more intuitive to navigate; provide the ability for licensees to store their continuing education records in the system; and prominently display a list of links, resources, and contact information for each of the Board's units on the user dashboard.

Dr. Daniels asked if licensees were aware they could renew online. Ms. Walker replied after the improvements have been implemented, staff will work closely with DCA to

encourage licensees to register for and use the Connect system, rather than filing paper applications.

Ms. Walker advised the Committee that Senate Bill 1434 (Roth, Chapter 623, Statutes of 2022) will become effective January 1, 2023, and will implement a new fee schedule and require licensees to file their telephone numbers and email addresses with the Board. Staff are working with DCA to make necessary updates to the license renewal notifications, and the Connect system allows licensees to update their telephone numbers and email addresses directly with the Board in real-time.

Ms. Walker also shared that staff has been reviewing existing manual, paper-based licensing processes to identify and remove any duplicative or unnecessary steps, improve timeframes, and prepare for the integration of some of those processes into the Connect system.

Dr. Daniels asked if Ms. Walker anticipates any challenges or problems with implementing those processes in Connect. Ms. Walker explained the original plan was to build HTML applications for each of the Board's existing functions but due to resource limitations, staff is now focusing on creating a convenient online portal for the miscellaneous application types where users can upload a completed application and pay the appropriate fee.

Dr. Daniels asked if the number of inactive licensees was identified or represented in the licensing population data in the meeting materials. Ms. Walker replied the number of inactive licensees is not listed separately in the data and offered to include that data in the next report to the Committee. She also noted it may be helpful for the Committee to review data on the number of licenses in forfeiture and canceled status.

Public Comment: None.

3. Review, Discussion, and Possible Recommendation Regarding Submission of Comments Regarding Proposed Revisions to Council on Chiropractic Education (CCE) Accreditation Standards and CCE Residency Program Accreditation Standards

Ms. Walker stated the Board was notified on September 1, 2022, that CCE is conducting a 60-day public comment period through October 31, 2022, regarding proposed revisions to the CCE accreditation standards and the residency program accreditation standards. She shared that staff reviewed the proposed revisions and had some concerns with the "Examples of Evidence" being moved to a guidance document without that document being available for concurrent review.

Dr. Daniels shared a similar concern regarding the "Examples of Evidence" guidance document. She also noted Meta-Competency 1 (Assessment & Diagnosis) includes the phrase "perform a case-appropriate examination" within Curricular Objective C and Outcome 2, but the term "case-appropriate examination" is not clearly defined. She

further explained that within Meta-Competency 2 (Management Plan), in addition to training to “Determine the need for emergency care, referral, and/or collaborative care,” students should also be trained in emergency procedures and the risks and complications of chiropractic care. In addition, the outcomes for this meta-competency should include that students are able to demonstrate their knowledge of red flags and how to proceed in emergency situations and/or when red flags have been identified. Dr. Daniels recalled how licensees’ failure to perform a complete examination, identify red flags, or take appropriate action in an emergency situation often result in disciplinary matters before the Board.

Under Meta-Competency 3 (Health Promotion and Disease Prevention), Ms. Cruz questioned the rationale of removing “appropriate hygiene in a clinical environment” from the curricular objectives and replacing it with “the importance of primary, secondary, and tertiary prevention in population health, including health promotion, disease prevention, and screening” while keeping “apply appropriate hygiene practices” in the outcomes.

Public Comment: None.

4. Review, Discussion, and Possible Recommendation Regarding the Application for New Chiropractic College Approval by Keiser University - College of Chiropractic Medicine

Ms. Walker informed the Committee that the Board received an application for approval of a new chiropractic college, Keiser University - College of Chiropractic Medicine (KUCCM), which offers a doctor of chiropractic degree program at its main campus in West Palm Beach, Florida, and received its initial accreditation from CCE in January 2019. She noted the following deficiencies or discrepancies in the application when compared to the prescriptive requirements within the Board’s regulations:

1. KUCCM does not have physiology labs or 660 hours of “true” electives. (California Code of Regulations [CCR], title 16, section 331.12.2(b) and (c))
2. KUCCM does not currently quantify 250 patient treatments, written interpretation of at least 30 x-ray views, or 518 hours of practical clinical experience. (CCR, title 16, section 331.12.2(b) and (e)(2-4))
3. The current graduate catalog and course syllabi state students must attend 80% of classes in order to be considered to sit for the final examination(s). CCR, title 16, section 331.11(f) requires presence in class at least 90% of the time to obtain credit for a course unless evidence of illness or other excusable reasons can be submitted.
4. KUCCM does not offer clinical experience in psychological counseling. (CCR, title 16, section 331.12(e))

Dr. Daniels noted potential concerns with the deficiencies in the clinical experience and x-ray interpretations, as those skills are necessary for a doctor of chiropractic's role as a primary care provider. She also indicated the importance of physiology labs and elective hours. Dr. Daniels emphasized the patient-centered approach to care and the recommendations for lifestyle and nutritional changes that are provided through chiropractic treatment. Ms. Cruz thanked Dr. Daniels for her feedback and perspectives on comprehensive patient care and practical clinical experience.

Public Comment: None.

5. Review, Discussion, and Possible Recommendation Regarding Existing Requirements for Filing Practice Addresses with the Board and Displaying Licenses or Satellite Certificates at Places of Practice (California Code of Regulations, Title 16, Sections 303 and 308)

Ms. Ah Po presented the topic of satellite certificates to the Committee to begin the discussion of whether changes are necessary to the existing regulations regarding licensees' additional places of practice, otherwise known as satellite offices. CCR, title 16, sections 303 and 308 require each licensee to file their proper and current place of practice address and each sub-office with the Board and display their license or satellite certificate in a conspicuous place at the location. However, a place of practice is not currently defined, and the regulations do not address temporary practice settings, such as sporting events or fairs, house calls, mobile clinics, and consultations at other facilities. Additionally, unless a licensee has an established chiropractic corporation, licensees are only required to file their practice address with the Board, not the name of the practice, which makes it challenging for the Board and the public to access this information. Currently, there is no clear way through the Board or DCA License Search to identify all licensees who practice at a specific location. The Board and consumers must then rely on the licensees' websites to determine this information. Ms. Ah Po also shared information with the Committee on how the California Acupuncture Board, the Dental Board of California, the Medical Board of California, the Osteopathic Medical Board of California, and the Physical Therapy Board of California handle multiple practice locations.

Dr. Daniels stated she was aware of the frustration some larger businesses were experiencing regarding the satellite certificate requirement in situations where many licensees are staffed within one company and travel to events or are rotated between locations. She agreed that more flexibility is needed while still ensuring the public is safe, comfortable, and has access to information regarding the treating provider after they receive care, particularly after receiving an adjustment at a sporting event, fair, or locum tenens scenario.

Dr. Daniels indicated the other healing arts boards' regulations did not offer much guidance, as none of the models would work for the Board's licensing population without changes. Dr. Daniels suggested a third category of certification for mobile

chiropractic, where that certification would be attached to a primary or satellite address with a QR code printed on the certificate, so the public is better able to scan and obtain their license information.

Ms. Walker noted this is the first time the issue has been discussed by the Committee and there are many different options to discuss and consider. One key issue is that mobile practices, house calls, or temporary fill-in situations are not addressed in regulation nor is a “place of practice” defined. She offered one potential solution of a location-based facility permit that identifies all licensees practicing at a specific location but with just one authorized individual who is responsible for the permit renewal and updates.

Ms. Walker suggested the Committee begin with defining the term “place of practice” and asked if mobile practices would be considered a “place of practice.” Dr. Daniels responded affirmatively but noted a mobile practice may not be associated with any physical location. However, the Board and the public must have a method to contact the licensee if there are any questions or complaints.

Ms. Walker stated the Committee will be asked at a future meeting to discuss public posting requirements to ensure the public is aware that licensees are regulated by the Board. This could be a notice posted to the wall, similar to other healing arts professions such as in dental or medical offices, or through paperwork and handouts, which would benefit public awareness in mobile chiropractic settings. Ms. Walker added the Enforcement Committee will be discussing updates to the Disciplinary Guidelines, including an optional probationary condition that restricts a probationer from practicing in a mobile setting when warranted for public safety purposes.

Dr. Daniels indicated the different practice settings will need to be defined and categorized. She suggested defining primary physical practice locations where the doctor of chiropractic license can be displayed, satellite certificates for licensees who travel to multiple physical locations, and mobile certificates for temporary practice settings such as sporting events or fairs. She also noted that mobile certificates should only be issued to active licensees who are not currently on probation. Ms. Walker agreed and suggested staff draft definitions for a “place or practice” and these practice settings so the Committee can continue its discussion. Dr. Daniels agreed and believed these changes could simplify the satellite office certificate process for licensees and staff and modernize this function.

Public Comment: None.

6. Public Comment for Items Not on the Agenda

Ms. Ah Po summarized a written public comment received from Falkyn Luouxmont, a student at Life Chiropractic College West. Mr. Luouxmont requested the Board consider an addendum to CCR, title 16, section 331.12.2, subdivision (e), which requires students to complete a minimum of 250 patient treatments or visits, including diagnostic

procedures, chiropractic adjustive technique, and patient evaluation, to receive credit for the encounter. Mr. Luouxmout requested the Board and Licensing Committee consider awarding students with partial credit if chiropractic adjustive technique was not performed during the visit due to circumstances where no subluxation was indicated during the patient examination or while utilizing another technique, such as the National Upper Cervical Chiropractic Association (NUCCA), versus the diversified technique.

Public Comment: Mr. Luouxmout agreed with the summary of his written comment and added that due to the protocol he uses, when patients return, no subluxation is identified and no adjustment is performed. As a result, he does not receive any credit for the patient visit and examination. He stated he will not be able to graduate unless the Board amends its regulations.

7. Future Agenda Items

Dr. Daniels requested the Committee discuss the following items at a future meeting: 1) a potential reduction of the renewal fee amount for inactive licenses and conducting a survey of licensees' opinions on the issue; 2) requirements for licensure in California through reciprocity; and 3) clinical requirements for chiropractic students that quantify the number of patient treatments versus visits.

Ms. Walker suggested the Committee also consider discussing the creation of a "retired" license status. Dr. Daniels agreed.

Public Comment: None.

8. Adjournment

Dr. Daniels adjourned the meeting at 1:20 p.m.



BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR
DEPARTMENT OF CONSUMER AFFAIRS • CALIFORNIA BOARD OF CHIROPRACTIC EXAMINERS

1625 N. Market Blvd., Suite N-327, Sacramento, CA 95834

P (916) 263-5355 | Toll-Free (866) 543-1311 | F (916) 327-0039 | www.chiro.ca.gov



Agenda Item 3
December 9, 2022

Update on Board's Licensing Program

Purpose of the Item

The Executive Officer and Board staff will provide the Committee with an update on the Board's Licensing Program activities and statistics.

Action Requested

This agenda item is informational only and provided as a status update to the Committee. No action is required or requested at this time.

A memo containing the Licensing Program update and statistics through November 30, 2022, will be provided to the Committee through a supplemental handout to these meeting materials.



**Agenda Item 4
December 9, 2022**

**Review, Discussion, and Possible Recommendation Regarding the Application
for New Chiropractic College Approval by Keiser University - College of
Chiropractic Medicine**

Purpose of the Item

The Committee will continue its review and discussion of the application for new chiropractic college approval by Keiser University - College of Chiropractic Medicine.

Dr. Jennifer Illes, Vice President of Keiser University - College of Chiropractic Medicine, and Lisa Nucci, Campus President of Keiser University West Palm Beach, will provide the Committee with a brief overview of the doctor of chiropractic program and address questions from the Committee regarding their application for new chiropractic college approval.

Action Requested

Following a discussion of the application, the Committee will be asked to make a recommendation to the Board on the provisional approval of Keiser University - College of Chiropractic Medicine.

Background

Sections 4 and 5 of the Chiropractic Initiative Act and California Code of Regulations (CCR), title 16, sections 330 through 331.16 outline the requirements for approval of chiropractic colleges by the Board. CCR, title 16, section 331.1 (Approval and Eligibility) states:

“(a) A school which initially meets the requirements of these rules shall be first provisionally approved. No school will be finally approved until a provisional program has been in operation for at least two years.

“(b) No school shall be provisionally approved until it shall present competent evidence of its organizational and financial ability to attain the minimum educational requirements set forth by these rules and institutional goals set forth in its application.

“(c) No school shall be provisionally approved unless there is a reasonable need for such school in the geographical area in which it is proposed to locate.

“(d) No school shall be provisionally approved until competent evidence of compliance with the requirements of Section 29023(a)(2) of the Education Code is filed with the Board.”

In addition, CCR, title 16, section 331.2 (Inspection and Survey) states:

“(a) No school shall be approved, provisionally or finally, until it has been inspected by the Board or its duly authorized representative, including but not limited to the Council on Chiropractic Education, and is found to be in compliance with the rules herein set forth.

“(b) Each school shall permit to the Board or its authorized representatives unhampered opportunity to inspect the school's facilities, interview its entire faculty and management, examine student, teaching, grading, performance and graduation records, and inspect and audit, for cause, at the school's expense, the financial and corporate records.”

Council on Chiropractic Education Accreditation Status

Keiser University - College of Chiropractic Medicine (KUCCM) offers a Doctor of Chiropractic degree program at its main campus in West Palm Beach, Florida, and received its initial accreditation status with the [Council on Chiropractic Education \(CCE\)](#) in January 2019.

Most Recent Accreditation Activity

At its January 2021 meeting, CCE determined no further reporting is required by KUCCM after CCE reviewed all materials related to the Program Statistics Report regarding the CCE Accreditation Standards and applicable policies and determined the program meets the standards for accreditation regarding planning (Section 2.A.2), finances (Section 2.D.1), and research and scholarship (Section 2.I.1).

Next Accreditation Cycle Reporting

Self-Study:	Spring 2022
Comprehensive Site Visit:	Fall 2022
Status Review Meeting:	January 2023
Program Characteristics Report:	Fall 2024
Interim Site Visit:	Fall 2026

Application to the Board for New Chiropractic College Approval

The Board received an application for new chiropractic college approval from KUCCM, along with a copy of the required documentation. A copy of the application is included in the meeting materials.

KUCCM outlined its compliance with most of the Board's requirements in the explanation portion of the application, but noted the following deviations or deficiencies:

- Attendance: The current KUCCM graduate catalog and course syllabi state students must attend at least 80% of classes in order to be considered to sit for the final examination(s). *(CCR, title 16, section 331.11(f) requires presence in class at least 90% of the time to obtain credit for a course unless evidence of illness or other excusable reasons can be submitted.)*
- Curriculum: KUCCM does not have physiology labs or 660 hours of "true" electives. *(CCR, title 16, section 331.12.2(b) and (c))*
- Curriculum: KUCCM does not offer clinical experience in psychological counseling. *(CCR, title 16, section 331.12.2(e))*
- Curriculum: KUCCM does not currently quantify 250 patient treatments, written interpretation of at least 30 X-ray views, or 518 hours of practical clinical experience. *(CCR, title 16, section 331.12.2(b) and (e)(2)-(4))*

General information regarding KUCCM's Doctor of Chiropractic Program is also posted on its website at <https://www.keiseruniversity.edu/doctor-chiropractic-dc/>.

The website also contains a [Professional Licensure Disclosure Notification Statement](#) indicating KUCCM has determined its educational program currently meets the requirements for licensure or certification in all states except California.

Attachment

- Application for New Chiropractic College Approval by Keiser University - College of Chiropractic Medicine

Note: To maintain compliance with Assembly Bill 434 (Baker, Chapter 780, Statutes of 2017) [State Web accessibility: standard and reports], the Board is unable to post the supporting documentation received with this application on its website. To obtain a copy of the additional documentation submitted with this application through a California Public Records Act request, please email chiro.info@dca.ca.gov or send a written request to the Board's office at the address above.

Check Sheet

To the Application for New Chiropractic College Approval

This **Check Sheet** is intended to assist you with filing a *complete* application. All items listed that are applicable to your situation must be submitted in order to assess the Doctor of Chiropractic Program (DCP).

Falsification or misrepresentation of any item or response on this application or any attachment hereto is sufficient basis for denying approval.

REFERENCES

Attached to the application is a copy of the California Code of Regulations, Title 16, Article 4, regarding approved schools and qualifications of applicants. Please reference this document when completing the questions on page 2 under Board Approval. These are also available on our website at www.chiro.ca.gov.

DOCUMENTATION

- Provide a copy of the Articles of Incorporation.
- Provide a copy of the self-study given to CCE.
- Provide a copy of the governing board's bylaws.
- Provide a copy of the college's statement regarding admission requirements in compliance with CCE standards.
- Provide a copy of the last CCE inspection report.
- Provide a copy of the college's calender.
- Provide a copy of the college's catalogue.

Section 331.1 of the California Code of Regulations states that:

"A school which initially meets the requirements of these rules shall be first provisionally approved. No school will be finally approved until a provisional program has been in operation for at least two years. No school shall be provisionally approved until it shall present competent evidence of its organizational and financial ability to attain the minimum educational requirements set forth by these rules and institutional goals set forth in its application. No school shall be provisionally approved unless there is a reasonable need for such school in the geographical area in which it is proposed to locate. No school shall be provisionally approved until competent evidence of compliance with the requirements of Section 29023(a)(2) of the Education Code is filed with the Board."



www.chiro.ca.gov

Application for New Chiropractic College Approval

Please **READ** all instructions prior to completing this application. **ALL** questions on this application must be answered, and all supporting documents must be submitted as per instructions. Please type or print neatly. When space provided is insufficient, attach additional sheets of paper. All attachments are considered part of the application.

Please print in ink or type

College Name Keiser University - College of Chiropractic Medicine						
Name of College President Lisa Nucci (Campus President)						
Address	Number	Street	City	State	Zip Code	
2085 Vista Parkway, West Palm Beach FL 33411						
Telephone number (561) 471-6000				E-mail address: jilles@keiseruniversity.edu		
COUNCIL ON CHIROPRACTIC EDUCATION (CCE) ACCREDITATION						
What date was the letter of intent sent to CCE? <u>April 28, 2015</u>						
When was your self-study completed and provided to CCE (please provide a copy)? <u>May 10, 2018</u>						
When did the site team come to your campus to validate the self-study? <u>October 8-11, 2018</u>						
List the date that the college was incorporated as a not-for-profit corporation and provide a copy of the Articles of Incorporation. <u>January 26, 2000</u>						
List the names and addresses of your governing body members. <u>See attached list.</u>						
Has the CCE identified any "concerns" with the college's DC Program? If yes, please attach a copy. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
When was the college awarded initial accreditation? <u>January 2019</u>						
Have there been any site visits by the Commission on Accreditation (COA) regarding a special issue of concern or a substantive change as determined by the COA? If yes, please attach a copy. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
Is the college accredited by any other accrediting agency? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No						
If yes, give the name of the accrediting body <u>Southern Association of Colleges and Schools</u>						
Has the college entered into any resolutions or agreements with CCE that deviate from the COA standards? If yes, attach a copy of the agreement. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
What was the date of the last CCE site visit? <u>October 8-11, 2018</u>						
What is the date of the next scheduled CCE site visit? <u>October 10-13, 2022</u>						

BOARD OF CHIROPRACTIC EXAMINERS LEGAL REQUIREMENTS

In addition to being CCE accredited, new colleges must also meet specific California requirements.

Provide a detailed explanation of how the college complies with each of the following California requirements, identified by code section. Attach a separate page(s) in response to each of the following sections (the sections are attached for reference).

Section 331.3 Supervision

Section 331.4 Financial Management

Section 331.5 Records

Section 331.6 Catalog

Section 331.7 Calendar

Section 331.9 Student Faculty Ratio

Section 331.10 Faculty Organization

Section 331.11 Scholastic Regulations

Section 331.12.2 Curriculum

Section 331.13 Physical Facilities

I certify under the penalty of perjury that the foregoing information contained in this application and any attachments hereto are true and correct, and that all subjects referred to herein are contained within the established curriculum as set forth in California Code of Regulations, Title 16, Section 331.12.2. Providing false information or omitting required information may constitute grounds for denial of approval status.



Signature of President

7/8/2022

Date

Lisa Nucci

Type or Print the President's Name



Est. 4/07

§331.3. Supervision.

- (a) Every approved school shall be under the supervision of a full-time president, dean, or other executive officer who shall carry out the objective and program of the school. Said officer shall have a minimum of two years experience in school administration prior to his appointment, or its equivalent in training.
- (b) The president, dean, or other executive officer shall render a report annually, covering topics such as student enrollment, number and changes in faculty and administration, changes in the curriculum, courses given, and the projections for future policy. Said annual report shall be filed with the Board within one month following the end of the academic year.
- (c) It shall be the duty of the president, dean, or other executive officer to obtain from each faculty member, prior to the beginning of the semester or school year, an outline and time schedule for each subject of the course. He shall approve such outlines and determine from time to time if they are being observed. A copy of this outline and a schedule of classes, showing the day and hour of presentation and the instructor shall be filed with the Board within three (3) weeks after the beginning of the term.
- (d) The dean shall maintain a record of the teaching load of each member of the staff in terms of classes taught, supervision, student counseling, committee work, and other assigned activities.
- (e) A permanent file of all class schedules, beginning with those as of the date of the school's approval shall be maintained by the dean. These shall be available for inspection and comparison with the courses described in the relative catalogs.
- (f) Schedules must be kept up to date and posted on a bulletin board available for student inspection.

§331.4. Financial Management.

The college shall keep accurate financial records and shall file an annual financial report including a profit and loss statement as well as an asset and liability statement prepared and signed by a qualified accountant. Said financial report shall be filed with the Board within three (3) months following the end of the school's fiscal year.

§331.5. Records.

There shall be maintained a good system of records, showing conveniently and in detail, the attendance, discipline, grades and accounts of the students, by means of which an exact knowledge can be obtained regarding each student's work. A personal file must be maintained for each student containing his admission credentials, photographs and other identifying personal items. Fireproof storage must be provided for the safekeeping of records.

§331.6. Catalog.

The school shall issue, at least biennially, a catalog setting forth the character of the work which it offers, and said catalog shall be filed with the Board. The content and format shall follow the usual pattern of professional school catalogs, and shall contain the following information:

- (a) A list of its trustees, president, dean and other administrative officers and members of the faculty with their respective qualifications;
- (b) Courses set forth by department, showing for each subject its content, value in term, semester hours, or credit hours;
- (c) Entrance requirements, conditions for academic standing and discipline, such as attendance, examinations, grades, promotion and graduation;
- (d) Matriculation, tuition, laboratory, graduation and special fees, and estimated costs of books, instruments, dormitory and board; and
- (e) Descriptions of the library, audio-visual facilities, laboratories and clinic facilities setting forth at least the minimum requirement hereinafter set forth in rules.

(f) No school will be accepted or retained in good standing which publishes in its catalog or otherwise, any misrepresentation regarding its curriculum, faculty or facilities for instruction.

§331.7. Calendar.

Each school may elect to use the semester, trimester or four-quarter term system.

A school calendar shall designate the beginning and ending dates of terms or semesters, the vacation periods and legal holidays observed, and the dates for semester and final examinations. The recitation or lecture period shall be not less than 50 minutes in length. The school may operate on a five or six-day week or any combination thereof, but the total number of hours of instruction shall be not less than 30 hours nor more than 35 hours per week. The total number of hours provided for each complete student's course, leading to the degree of Doctor of Chiropractic, shall be not less than 4,400 hours distributed over four academic years of nine months each.

§331.9. Student Faculty Ratio.

- (a) The full-time equivalent student-faculty ratio shall be at least one full-time professor to every fifteen (15) students enrolled in the school.
- (b) A full-time professor is one who devotes a minimum of 38 hours per week to his academic duties.
- (c) The maximum enrollment for any class in laboratory or clinical work shall be limited to the number which may, by Board standards, sufficiently be trained with the equipment and facilities available in such laboratory clinic.
- (d) All classes and laboratory sessions, including clinics, shall be conducted under the presence and supervision of a full-time professor.
- (e) There shall be one instructor for each twenty-five (25) students in the laboratory and/or clinic courses.

§331.10. Faculty Organization.

(a) A faculty shall be organized by departments. Regularly scheduled meetings of the full faculty shall be had to provide a free exchange of ideas concerning:

- (1) The content and scope of the curriculum;
- (2) The teaching methods and facilities;
- (3) Student discipline, welfare and awards;
- (4) Faculty discipline and welfare;
- (5) Committee reports and recommendations;
- (6) Recommendations for the promotion and graduation of students;
- (7) Administration and educational policies; and
- (8) Recommendations to the administrative officers and to the trustees.

(b) The dean shall appoint the following standing committees of which he shall be a member ex officio: admissions and credentials, curriculum, clinic, laboratories, library and examinations, grades and records.

§331.11. Scholastic Regulations.

(a) Admission.

(1) Each school shall have a committee on admissions and credentials. The admission of students shall be in the hands of a responsible officer who is a member of the committee and his decision shall be subject to the approval of the committee.

(2) No applicant shall be admitted to any school until he has been personally interviewed for the purpose of determining his character, scholastic aptitude, mental and physical fitness to study and practice. When a great geographic distance precludes personal interview, the same information, supported by affidavits and photographs, may be substituted for the personal interview.

(3) Documentary evidence of preliminary education must be obtained and kept on file. All transcripts of other schools must be obtained directly from such schools.

(4) It is strongly recommended by the Board that an entrance examination compiled and administered by recognized testing agencies (e.g., A.C.T., S.A.T.) be required of all students prior to matriculation in order to prove their ability to do college level work.

(b) Date of Matriculation. No student shall be matriculated at a later date than one week immediately following the advertised date of the commencement of the school term.

(c) Qualifications of Students. No student shall be matriculated in an approved school unless he is of good moral character and is without major physical deficiencies, except as provided in Section 8.1 of the Act.

(d) Professional Education. Students shall not be matriculated in any school approved by the board unless they possess, and submit to the school upon their application for matriculation, either:

(1) A diploma from a standard high school or other institution of standard secondary school grade evidencing completion by the student of a four (4) year course, or

(2) A certificate from the board stating that the student has submitted proof, satisfactory to the board, of education equivalent in training power to a high school course. The certificate shall bear a date prior to the applicant's matriculation date in any school approved by the board.

(3) A student who seeks admission in any school approved by the Board after November 3, 1976, shall be subject to the following: The candidate must have completed, with a satisfactory scholastic record, at least 60 semester hours or an equivalent number of quarter hours in prechiropractic subjects at a college listed in the U.S. Office of Education "Education Directory--Higher Education." The specific prechiropractic subjects and hour requirements shall be in accordance with the standards adopted by the Council on Chiropractic Education.

(e) Advanced Standing.

(1) Applicants for admission to advanced standing shall be required to furnish evidence to the school:

(A) That they can meet the same entrance requirements as candidates for the first year class;

(B) That courses equivalent in content and quality to those given in the admitting school in the year or years preceding that to which admission is desired have been satisfactorily completed;

(C) That the work was done in a chiropractic college acceptable to the committee on admissions of the college; and

(D) That the candidate has a letter of recommendation from the dean of the school from which transfer is made.

(2) Credits for work done in colleges of liberal arts and sciences will be allowed based on the regulations of the Council on Chiropractic Education.

(3) Credits for basic science subjects on the professional level shall be in accordance with the provisions of the regulations of the Council on Chiropractic Education.

(4) A student desiring to re-enter the college after a lapse in attendance of one or more years shall fulfill the entrance requirements applying to the class which he seeks to enter. Students whose education was interrupted by service in the armed forces are exempt from this requirement.

(5) For all such students admitted to advance standing there will be, therefore, on file with the registrar the same documents as required for admission to the first-year class and in addition a certified transcript of work completed, together with a letter of honorary dismissal from the college from which transfer was made.

(6) No candidate for a degree shall be accepted for less than one full academic year of resident study.

(f) Attendance. In order to obtain credit for a course, a student shall have been present in class at least 90 percent of the time and shall have received a passing letter grade. When the absence exceeds 10 percent, the student shall be automatically dropped from the class. If the absences have been due to illness or other excusable reasons and if evidence of these reasons can be submitted, the student may apply for readmission through the dean's office and may be given credit for attendance upon the recommendation of his instructor and completion of course requirements. Students shall be required to spend the last academic year of the course in residence in the college which confers the degree.

(g) Promotion.

(1) Promotion from one school term to another should be by recommendation of the instructors and consent of the committee on credentials or other similar committee. The decision should be based upon careful evaluation of the student's attendance, application, conduct and grades in quizzes and examinations. In other words, the final standing of the student in each subject shall be based upon the composite judgment of the responsible instructors in that department, and not solely upon the result of written examinations.

(2) A student failing in any subject in a school term should be required to repeat the subject.

(h) Requirements for Graduation. The requirements for admission to the school shall have been fulfilled and the candidate, in addition to scholastic qualitative requirements, shall have completed a minimum quantitative requirement of 4,400 hours of instruction in four academic years of nine months each. The last year shall have been spent in the school granting the degree.

The candidate shall have complied with all the regulations of the school and be recommended for the degree by the faculty.

(i) Special (Graduate of An Approved Chiropractic School) or Unclassified Subject. Persons so registered may not be a candidate for a degree. If they desire to become candidates, they shall satisfy the usual requirements for admission as well as the degree requirement. No work done under this classification will be accepted for credit beyond 90 days from the date of matriculation. Holders of a valid chiropractic degree are exempt from this requirement.

(j) Degree. The degree conferred for completion of professional undergraduate work shall be Doctor of Chiropractic (D.C.).

§331.12.2. Curriculum.

All applicants for licensure shall be required to comply with this section in order to qualify for a California chiropractic license.

(a) Course of Study: Every school shall have a curriculum which indicates objectives, content and methods of instruction for each subject offered.

(b) Required Hours and Subjects: Each applicant shall offer proof of completion of a course of instruction in a Board-approved chiropractic college of not less than 4,400 hours which includes minimum educational requirements set forth in Section 5 of the Act. The course of instruction completed by the applicant shall consist of no less than the following minimum hours, except as otherwise provided:

Group I	Anatomy, including embryology, histology and human dissection	616 hours
Group II	Physiology (must include laboratory work)	264 hours
Group III	Biochemistry, clinical nutrition, and dietetics	264 hours
Group IV	Pathology, bacteriology, and toxicology	440 hours
Group V	Public health, hygiene and sanitation, and emergency care	132 hours
Group VI	Diagnosis, including E.E.N.T. and serology, dermatology and sexually transmitted diseases, geriatrics, X-ray interpretation, and neurology	792 hours
Group VII	Obstetrics, gynecology, and pediatrics	132 hours
Group VIII	Principles and practice of chiropractic to include chiropractic technique, chiropractic philosophy, orthopedics, X-ray technique, and radiation protection	430 hours
	Clinic, including office procedure	518 hours
	Physiotherapy	120 hours
	Psychiatry	32 hours
	Electives	660 hours
		Total 4,400 hours

(c) Subject Presentation: Laboratory teaching with actual student participation shall be included in human dissection, histology, chemistry, physiology, bacteriology, pathology, X-ray and physiotherapy. Each school shall have and use at least one phantom or equivalent equipment for X-ray class and other courses as may be necessary for adequate teaching.

Classes shall be presented in proper academic sequence. Each student shall be taught micro and gross anatomy, human dissection, and physiology before pathology; biochemistry before or concurrent with physiology; and diagnosis before or concurrent with the study of pathology. Clinic hours shall be taken only after a student completes all hours in or concurrently with diagnosis.

(1) ANATOMY: To include gross anatomy, human dissection, embryology and histology.

(2) PHYSIOLOGY: To include the physiology of blood and lymph, circulation, respiration, excretion, digestion, metabolism, endocrines, special senses and nervous system.

(3) BIOCHEMISTRY AND NUTRITION: Biochemistry to include the chemistry of foods, digestion, and metabolism. Nutrition to include dietetics and clinical nutrition in the prevention and treatment of illnesses.

(4) PATHOLOGY AND BACTERIOLOGY: Pathology to include general and special pathology. Bacteriology to include parasitology and serology.

(5) PUBLIC HEALTH, HYGIENE, SANITATION AND EMERGENCY CARE: To include sanitary and hygienic procedures, First Aid, minor surgery, prevention of disease, and Public Health Department regulations.

(6) DIAGNOSIS: To include physical, clinical, laboratory and differential diagnosis; E.E.N.T., geriatrics, serology, dermatology, syphilology, roentgenology (technique and interpretation) and the rules and regulations of the Radiologic Technology Certification Committee of the State Department of Health Services.

(7) OBSTETRICS, GYNECOLOGY AND PEDIATRICS: To include the standard routine diagnostic procedures and clinical and laboratory examinations.

(8) PRINCIPLES AND PRACTICE OF CHIROPRACTIC, DIETETICS, PHYSIOTHERAPY, AND OFFICE PROCEDURE: To include history and principles of chiropractic, spinal analysis, adjustive technique of all articulations of the body, orthopedics and patient counseling in curriculum subject matters.

(9) PHYSIOTHERAPY: To be eligible for licensure, each applicant must furnish proof satisfactory to the Board of successful completion of the required 120 hours of physiotherapy course work and additional clinical training in which the theory, principles and use of the standard recognized physiotherapy equipment and procedures were demonstrated to and used by the applicant. This shall include a minimum of thirty (30) patient office visits in which physiotherapy procedures are performed by the student on their own clinic patients. If physiotherapy course work is not offered by the chiropractic college where the student matriculated, the required instruction and clinical training in physiotherapy may be completed at another Board-approved chiropractic college, provided such course is a regular credit course offered primarily to matriculated students.

Physiotherapy course work not completed prior to graduation from chiropractic college may be fulfilled by course work taken subsequent to graduation at a Board-approved chiropractic college in conjunction with clinical training in physiotherapy offered by that college. Such course work and clinical training must be regular credit course work and clinical training offered primarily to matriculated students.

(10) OFFICE PROCEDURE: To include private office and case management, the writing and completion of reports and forms for insurance claims, and the provisions, rules and regulations of the Chiropractic Act, and the Radiologic Technology Certification Committee of the State Department of Health Services.

(d) Additional Hours and Subjects: It is recommended that a school offer elective subjects, including chiropractic meridian therapy, counseling, hypnotherapy and biofeedback. The school may offer and require for graduation courses of more than 4,400 hours.

(e) Clinics: Each student shall be provided with actual clinical experience in the examining, diagnosing, and treatment of patients. Such clinical experience shall include spinal analysis, palpation, chiropractic philosophy, symptomatology, laboratory diagnosis, physical diagnosis, Xray interpretation, postural analysis, diagnostic impressions, and adjusting of various articulations of the body, psychological counseling and dietetics. Individual case files on each patient together with a record of dates and treatments given and student treating shall be kept and available to the board for inspection.

Clinical hours, as described in this section, including those relating to physiotherapy, must be completed in a clinic operated or supervised by a chiropractic college.

Each student shall be required to complete, as a minimum for graduation, the following:

(1) Twenty-five (25) physical examinations of which at least ten (10) are of outside (not student) patients.

A physical examination shall include an evaluation of all vital signs, case history, orthopedic and neurological testing. Students shall also have practical clinical laboratory training, including twenty-five (25) urinalyses, twenty (20) complete blood counts (CBCs), ten (10) blood chemistries, and thirty (30) X-ray examinations. Students shall perform ten (10) proctological and ten (10) gynecological examinations. Proctological and gynecological examinations may be performed on a phantom approved by the Board. Gynecological and proctological examinations not completed prior to graduation may be completed after graduation at a Board-approved chiropractic college.

(2) Students shall perform a minimum of two hundred and fifty (250) patient treatments (visits), including diagnostic procedures, chiropractic adjustive technique and patient evaluation.

(3) Written interpretation of at least thirty (30) different X-ray views, either slide or film, while a senior in the clinic, in addition to other classroom requirements which shall include the spinal column, all other articulations of the body, and soft tissue.

(4) Minimum of five hundred eighteen (518) hours of practical clinical experience (treating patients in the clinic).

§331.13. Physical Facilities.

(a) General: Each school shall own, or enjoy the assured use of a physical plant large enough to accommodate classrooms, lecture rooms, laboratories, a clinic, a library and administrative and faculty offices. Each school shall meet and maintain the standards and requirements established by or under the authority of the laws of the State of California governing educational institutions and all applicable city and county ordinances wherein the school is located and shall maintain competent evidence of such compliance, for examination by the Board.

(b) Administrative Offices: The administrative offices shall provide adequate office space for faculty members:

There shall be space available for faculty conferences.

All furnishings shall be serviceable and functional and there shall be sufficient office equipment, subject to Board approval, to efficiently manage the business of the school.

There shall be fireproof storage for all records and documents required by the Chiropractic Initiative Act, statute, or regulations.

All administrative offices shall meet the standards and requirements incorporated by subparagraph (a) above.

(c) Classrooms: There shall be sufficient number and size of classrooms to separately accommodate the graded classes in 1st, 2nd, 3rd and 4th year classes. No two or more subjects shall be taught in the same classroom simultaneously. No two or more student classes (1st, 2nd, 3rd and 4th year) shall be taught in the same classroom simultaneously.

Classrooms shall be located where there is quiet and freedom from interruption and distraction.

All classrooms shall be furnished with audio-visual aids appropriate to the subject matter being taught, and desks and chairs or tablet armchairs. There shall be effective shades to darken rooms equipped with visual projection apparatus.

All classrooms shall meet the standards and requirements incorporated by subparagraph (a) above.

(d) Laboratories: Laboratories shall be well lighted and ventilated and shall be equipped for the practical work in human dissection, histology, chemistry, physiology, bacteriology, pathology, laboratory diagnosis, roentgenology, physiotherapy and chiropractic technique.

Anatomy and pathology laboratories shall contain standard equipment. No more than ten (10) students shall be assigned per table. Sinks should be equipped with wrist action or foot pedal valves, and supplied in a sufficient number. Human cadavers and specimens for individual and small group demonstrations shall be supplied. If human cadavers are not available, or state law prohibits their use, schools must obtain prior written approval from this Board.

Microscopic laboratories shall have one microscope and one desk light for each two (2) students in the class.

Chiropractic technique laboratories shall be equipped with one chiropractic adjusting table for every four (4) students in the class.

Actual student experience with X-ray phantom or equivalent for all areas of the body shall be necessary.

Additionally, all laboratories shall meet the standards and requirements incorporated in subparagraph (a) above.

(f) Teaching Aids and Equipment: For the subject of physiotherapy there shall be sufficient generally recognized equipment for classroom and clinic purposes (to include sine galvanic, ultrasound, diathermy, ultraviolet, heat, cold, percussion, and transaction). For the practical work and physical diagnosis students shall be required to own the ordinary and usual diagnostic instruments, including, but not limited to, thermometers, stethoscopes, sphygmomanometers, oto-ophthalmoscope examination sets, and orthopedic-neurological examination instruments.

Each school shall own and teach the use of the current standard diagnostic instruments and a list of same shall be made available to the Board upon request. For classroom demonstration and visual education aids, each school shall own charts, mannequins, skeletons, bone collections, anatomical and embryological models, stereopticons, balopticons, micro-projections, and video players or similar projection equipment. The film and slide library shall be constantly augmented by the addition of new material.

(g) Library: A library shall be provided for the use of the student body. The minimum requirements for a library are:

(1) Operation of the library shall be under the direct supervision of a full-time librarian holding a degree in library science.

(2) The library shall be open to students a minimum of eight (8) hours per day. It shall have room available for study purposes to accommodate at least ten (10) percent of the enrolled students at one time. Hours shall be posted.

(3) The library volumes shall be cataloged, using a generally accepted system.

(4) The library shall consist of a minimum of 5,000 volumes of which 2,000 shall be less than ten years of age. Only cataloged scientific volumes which are of interest to the published curriculum of the school can be counted as library volumes. Unbound journals and periodicals shall not be counted in determining compliance with this rule.

(5) Each school shall conduct a program of student orientation as to the use of the library and class assignments involving the use of the library.

(h) Clinic: Each school shall operate a general out-patient clinic where the senior students will obtain actual experience, practical knowledge and skill in:

(1) Diagnosis, including physical examination, palpation, spinal analysis, clinical pathological, laboratory findings, X-ray, and tentative and working diagnoses.

(2) Adjustive technique, dietetics, and psychotherapy for the care or prevention of disease in accordance with Section 7 of the Act.

Such a clinic shall at all times be under the supervision of a clinician who meets the standards of the Council on Chiropractic Education.

The minimum requirements of a clinic are:

(A) A reception room with a minimum seating capacity for ten (10) persons.

(B) A minimum of five (5) patient dressing rooms that are equipped with at least curtains to ensure privacy.

(C) An administration area wherein at least one full-time secretary shall be located and patient files shall be maintained.

(D) A minimum of one (1) office for each faculty member supervising the clinic with a minimum of two (2) such offices.

(E) Separate lavatories for men and women with a minimum of one (1) each.

(F) A minimum of one (1) physical examination room for every ten (10) students concurrently present and enrolled in the clinic.

(G) A minimum of one (1) chiropractic adjusting table for every five (5) students performing adjustments on clinic patients with a minimum of five (5) such tables.

(H) A minimum of one (1) X-ray examination room that is equipped with at least one (1) X-ray machine that has a capacity of no less than 125 KV plus 300 M.A. There shall also be an X-ray developing room that is equipped with the appropriate and necessary film processing equipment as required by the Board. This room may be an area within the X-ray procedure room or shall be located in the immediate area in the same building of such X-ray procedure room. A list of minimal X-ray equipment which shall be used must be obtained from the Board.

(I) A lab room equipped with a sterilization facility, unless waived in writing by the Board.

(J) In addition to the requirements of section 331.12(e), each student's work, conduct, reliability and personality shall be evaluated in writing by his or her supervising teacher and such evaluation shall become a part of the student's record and shall be available for inspection by the Board.

(i) Operation and Maintenance of the Physical Plant. In addition to the requirement of subparagraph (a) above, each school shall operate and maintain all physical equipment in good repair. Lockers shall be available for student use.

Suffix	First	Last	Title	Company	City	State
Program:	CHIROPRACTIC MEDICINE - Vice President of the			College of Chiropractic Medicine: Dr. Jennifer Illes		
Dr.	Spencer	Baron	Chiropractor	Neurosport Elite	Hallandale	FL
Dr.	Ron	Brodkin	Chiropractor	Brodkin Chiropractic and Acupuncture Center	Boca Raton	FL
Dr.	Michael	Chimes				
Dr.	James Paul	Cima	Chiropractor	PGA Chiropractic Health Center	Palm Beach Gardens	FL
Dr.	John	D'Amico	Chiropractor	Veteran's Hospital, Miami FL	Miami	FL
Ms.	Edan	Della Mea	Marketing Director	Rosenthal, Levy, Simon, & Sosa	West Palm Beach	FL
Dr.	Etienne	Dubarry	Chiropractor			
Dr.	Alex	Keith	Chiropractor	Advanced Wellness Sports & Chiropractic Center	Lake Worth	FL
Dr.	Timothy	Kennedy	Chiropractor		Port St. Lucie	FL
Dr.	Robert	Klein	Chiropractor			
Dr.	Arthur	LeVine	Chiropractor	iCollect Medical Building Services	Plantation	FL
Dr.	Jeffrey	Mackey	Chiropractor		Boynton Beach	FL
Dr.	Tim	McQueeney	Chiropractor	Total MD	West Palm Beach	FL
Dr.	Gregg	Moses	Chiropractor	Moses Chiropractic	West Palm Beach	FL
Dr.	Todd	Narson	Chiropractor	Miami Beach Family & Sports Chiropractic	Miami Beach	FL
Dr.	Michael	Newman	Chiropractor	Dr. Michael P. Newman D.C., P.A.	Miami	FL
Dr.	Steve	Perman	Chiropractor	Mission Bay Chiropractic Center	Boca Raton	FL
Dr.	James	Piccolino, Esq.	Chiropractor	New Sound Health	Miami	FL
Dr.	Richard	Pomante	Chiropractor	Dr. Richard Pomante	West Palm Beach	FL
Dr.	Alex	Wasserman	Chiropractor	Wasserman Chiropractic of Palm Beach	Palm Beach Gardens	FL
Dr.	Ron	Wellikoff	Chiropractor	Plantation Medical	Plantation	FL

331.3. Supervision

(a) Every approved school shall be under the supervision of a full-time president, dean, or other executive officer who shall carry out the objective and program of the school. Said officer shall have a minimum of two years experience in school administration prior to his appointment, or its equivalent in training.

Keiser University College of Chiropractic Medicine Response:

Dr. Jennifer Illes, is the Vice President of the College of Chiropractic Medicine. This is a full-time position that she has held for the past 6 months. She has previous leadership roles, notably at National University of Health Sciences and D'Youville College. She's been involved in academia for over 15 years, and is currently the faculty American Chiropractic Association President.

(b) The president, dean, or other executive officer shall render a report annually, covering topics such as student enrollment, number and changes in faculty and administration, changes in the curriculum, courses given, and the projections for future policy. Said annual report shall be filed with the Board within one month following the end of the academic year.

Keiser University College of Chiropractic Medicine Response:

This report will be made available to the Board. Currently this type of report, called the PEAR report, is also prepared on an annual basis for the CCE.

(c) It shall be the duty of the president, dean, or other executive officer to obtain from each faculty member, prior to the beginning of the semester or school year, an outline and time schedule for each subject of the course. He shall approve such outlines and determine from time to time if they are being observed. A copy of this outline and a schedule of classes, showing the day and hour of presentation and the instructor shall be filed with the Board within three (3) weeks after the beginning of the term.

Keiser University College of Chiropractic Medicine Response:

The faculty members submit their new semester syllabi to the Curriculum Committee for review and processing prior to it making its way to the Vice President of the chiropractic program. The faculty and administrative work together during a faculty meeting to get the times for the classes, and schedules organized prior to the start of a new semester.

(d) The dean shall maintain a record of the teaching load of each member of the staff in terms of classes taught, supervision, student counseling, committee work, and other assigned activities.

Keiser University College of Chiropractic Medicine Response:

The teaching load, with course credits, and instructional hours is updated every semester. A copy of this workgrid is seen labelled as “Evidence of 4400 hours instruction” in the attachments section.

(e) A permanent file of all class schedules, beginning with those as of the date of the school's approval shall be maintained by the dean. These shall be available for inspection and comparison with the courses described in the relative catalogs.

Keiser University College of Chiropractic Medicine Response:

There is no dean of the program, however Dr. Jennifer Illes (Vice President) is approved and maintained at her level.

(f) Schedules must be kept up to date and posted on a bulletin board available for student inspection.

Keiser University College of Chiropractic Medicine Response:

The schedules are up to date. They are sent out electronically to the student, they are available on their student portal, and the schedules are printed in the administrative assistant’s area for students to take a copy if needed. Outside of each classroom is a copy of the class, and time for that particular room.

331.4. Financial Management

The college shall keep accurate financial records and shall file an annual financial report including a profit and loss statement as well as an asset and liability statement prepared and signed by a qualified accountant. Said financial report shall be filed with the Board within three (3) months following the end of the school's fiscal year.

Keiser University College of Chiropractic Medicine Response:

The campus president prepares a preliminary consolidated budget that is submitted to the Office of the Vice Chancellor of Finance. The chancellor's cabinet reviews and either accepts, rejects or makes recommendations to the proposed budget. If accepted, the annual budget is presented to the Board of Trustees for final approval, with or without modification.

There have been two independent financial audits (2019, and 2020) since the last SSR that has been reviewed for Everglades College, Inc. Both audits were performed by Boisseau, Felicione & Associates, Inc. They state, "audited the accompanying financial statements of Everglades College, Inc., which comprise the statement of financial position as of December 31, 2019, and the related statements of revenue, expenses and change in net assets, and cash flows for the year then ended, and the related notes to the financial statements".

Budgetary resource allocation for the Doctor of Chiropractic Program is based upon the full-time enrollment (FTE) status of the students in the program verses the students in the entire campus. Additional financial resources can be available upon request.

331.5. Records

There shall be maintained a good system of records, showing conveniently and in detail, the attendance, discipline, grades and accounts of the students, by means of which an exact knowledge can be obtained regarding each students work. A personal file must be maintained for each student containing his admission credentials, photographs and other identifying personal items. Fireproof storage must be provided for the safekeeping of records.

Keiser University College of Chiropractic Medicine Response:

All student records are kept in a firewall protected electronic data base called Campus Nexus. Every administrator, and faculty have access to the student's records when needed through appropriate log-in credentials. Items include, unofficial transcripts, school documentation (admissions paperwork, background checks, CPR, and OSHA documentation). Also included are and email and/or text sent through the Campus Nexus format. These files are also held in a large fireproof safe in paper format.

331.6. Catalog

The school shall issue, at least biennially, a catalog setting forth the character of the work which it offers, and said catalog shall be filed with the Board. The content and font shall follow the usual pattern of professional school catalogs, and shall contain the following information:

- (a) A list of its trustees, president, dean and other administrative officers and members of the faculty with their respective qualifications;
- (b) Courses set forth by department, showing for each subject its content, value in term, semester hours, or credit hours;
- (c) Entrance requirements, conditions for academic standing and discipline, such as attendance, examinations, grades, promotion and graduation;
- (d) Matriculation, tuition, laboratory, graduation and special fees, and estimated costs of books, instruments, dormitory and board; and
- (e) Descriptions of the library, audio-visual facilities, laboratories and clinic facilities setting forth at least the minimum, requirement hereinafter set forth in rules.

Keiser University's College of Chiropractic Medicine Response:

The Keiser University Graduate Catalog is easily accessed online through <https://www.keiseruniversity.edu/wp-content/uploads/catalogs/KU-Graduate-Catalog.pdf>. There are updates/addendums that are created at least 2x/year to this catalog.

- a. The Governance and Board of Trustees is located on page 19 of the Graduate Catalog (seen below).

Governance

Keiser University is a not-for-profit 501(c)(3) corporation incorporated in the State of Florida. Keiser University is managed and controlled by the Everglades College, Inc. Board of Trustees which is the legal entity responsible for policy and procedure promulgation, review and amendment.

Board of Trustees

CHAIR:

Gregg Wallick, President, Best Roofing

MEMBERS:

Tom Foster, President, Foster Learning Corporation

Frank Frione, President/CEO GFA International

Maria C. Kondracki, President, Strategic Planning, Inc.

Brett Overman, Founder and CEO, Zips Car Wash

Dr. Bill Kent, President, Team Horner Group

Craig Perry, CEO, Perry Ventures

Manuel Mair, Owner, One-to-One Fitness

Jose Cortes, Director Dept. Design and Construction Mgt., City of Hollywood, FL

Joshua Fordin, Sr. Associate, Hogan Lovells US LLP

b. On page 133, the chiropractic programs faculty are listed along with their qualifications. The attachment, called “KU Graduate Catalog” has also been added. The Chiropractic Program specific program area starts on page 149 as seen below.

CHIROPRACTIC MEDICINE

DOCTOR OF CHIROPRACTIC

Program Description

The Doctor of Chiropractic program at Keiser University is a rigorous professional program consisting of ten semesters of study which are completed over 40 months. It combines traditional lectures with small group learning, weekly conferences and seminars, laboratory and experiential sessions, and clinical training opportunities at a number of sites. All coursework includes case-based relevancy for chiropractic practice as a portal-of-entry profession dedicated to excellence in spine care.

Throughout the ten semesters of study, a number of cross-cutting themes are embedded within the courses, enabling students to integrate their studies around a clinically relevant framework. These themes all focus on the role of chiropractic as a conservative clinical approach to spine care, and include chiropractic sports medicine, chiropractic geriatrics, and chiropractic general practice, as well as other

There area 216 credits, that are outlined with the classes starting on page 150.

Program Outline

To receive a Doctor of Chiropractic degree from Keiser University, students must complete the prescribed course of study within a maximum of 6 years. The program consists of 10 semesters of continuous study over 40 months, totaling 216 credit hours. Over 25% of this consists of clinical experience in a variety of settings. Throughout the program, crosscutting themes are embedded in the coursework, covering major areas of relevance to chiropractic practice, such as chiropractic sports medicine and chiropractic geriatrics.

Doctor of Chiropractic Core Courses (216 credit hours)

DCP711	Molecules and Cells	2.0 credit hours
DCP712	Biochemistry 1	3.0 credit hours
DCP713	Physiology 1	3.0 credit hours
DCP714	Biochemistry 2	3.0 credit hours

- c. There are general graduation entrance requirements seen on page

ADMISSIONS

General Admission Requirements

Applicants desiring to enter Keiser University must submit an application to the Admissions Office well in advance of the start date. This permits proper scheduling and assures availability of classroom space. Applications for Winter, Spring or Fall semesters should be made as early as possible, as these entry dates are normally the time of greatest enrollment.

The University reserves the right to deny admission to any prospective student that in their judgment poses an undue risk to the safety or security of the University and the University community. This judgment will be based on individual determination taking into account any information the University has about a prospective student’s criminal record including the presence of secondary school students on the campus.

Additionally, the University reserves the right to evaluate the individual circumstances regarding registered sex offenders, and in certain cases refuse admission to the University. When a prospective student receives a registered sex offender designation, the University reserves the right to place the admissions process on hold, contingent upon the review and approval from a designated acceptance committee.

Keiser University reserves the right to accept up to 5% of applicants to a graduate program who do not meet appropriate **entrance** test scores and/or GPA but who request admission based on other criteria. An appeal letter and accompanying documentation should be addressed to the Associate Vice Chancellor of Academic Affairs for Graduate Education; such requests will be reviewed by the Associate Vice Chancellor of Academic Affairs for Graduate Education, program leadership, and others as appropriate. If the appeal is approved, a waiver letter is placed in the applicant’s academic file by the Associate Vice Chancellor of Academic Affairs for Graduate Education or the appropriate designee.

- d. The specific fee disclosures for the graduate programs are located on page 69.

TUITION, FEES, AND OTHER COSTS	69
Tuition and Fee Disclosure – Keiser University Graduate School	69
Tuition and Fee Disclosure – Nurse Anesthesia Program	71
Required and Optional Fees for Programs.....	73
Residential (Flagship) Campus.....	74
<i>Cancellation and Refund Policy.....</i>	<i>77</i>
<i>Return of Title IV Funds (R2T4)</i>	<i>77</i>
Cancellation/Withdrawal Calculation.....	78

Doctor of Chiropractic	
12+ credits	\$12,940.00
9 to 11.99 credits	\$9,705.00

70

6 to 8.99 credits	\$6,470.00
3 to 5.99 credits	\$3,235.00

*Students are responsible for the cost of their travel, accommodations, food, and other expenses associated with residencies.

**Tuition for students less than full time: tuition is charged based on a pro rata calculation at the beginning of the semester

Doctor of Chiropractic	NBCE Parts I-IV and Physiotherapy \$4,165 <ul style="list-style-type: none"> • Part I \$710 • Part II \$710 • Part III \$710 • Physiotherapy \$450 • Part IV \$1585 Live NBCE Review \$500 OSHA \$15.95-\$20.95 HIPAA \$15.95-\$20.95 BLS (CPR) \$15.95-\$20.95 OSHA2 \$15.95-\$20.95 BLS (CPR)2 \$15.95-\$20.95 HIPAA 2 \$15.95-\$20.95 Student American Chiropractic Association \$60	
------------------------	---	--

- e. There are multiple resources, including the library outlined with the catalog.

Learning Resources

Keiser University's Library is a university wide "system library" with a branch located at each brick and mortar campus as well as an electronic collection of resources; all of which serve both online and on campus students and faculty. The library holds membership in a plethora of specialized

83

state and private library consortia, and is a participant in the online Ask-A-Librarian program. The library's collections are curated and managed by a team of more than 25 professional librarians each of whom holds a master of library science degree from an American Library Association Accredited institution. The library's combined collections currently total well over 120,000 titles and continue to expand. In addition the library provides access to over 80 electronic database resources, e-books and dozens of specialized subject related links. The main library is open more than 75 hours per week. Training in the utilization of the library's general and specialized resources is provided through online videos, and presentations that are located on the library's website as well as by telephone, e-mail, and in person. The library publishes tip sheets and subject pathfinders and makes them freely available for each of the various programs of study offered at the university. Training sessions are provided to students early in their programs of study and the library prides itself on making such training available upon demand in a variety of different formats.

- f. No school will be accepted or retained in good standing which publishes in its catalog or otherwise, any misrepresentation regarding its curriculum, faculty or facilities for instruction. Our Chiropractic Program supports the boards statement.

331.7. Calendar

Each school may elect to use the semester, trimester or four-quarter term system. A school calendar shall designate the beginning and ending dates of terms or semesters, the vacation periods and legal holidays observed, and the dates for semester and final examinations. The recitation or lecture period shall be not less than 50 minutes in length. The school may operate on a five or six-day week or any combination thereof, but the total number of hours of instruction shall be not less than 30 hours nor more than 35 hours per week. The total number of hours provided for each complete student's course, leading to the degree of Doctor of Chiropractic, shall be not less than 4,400 hours distributed over four academic years of nine months each.

At Keiser University's College of Chiropractic Medicine Program the use of a "semester" system is utilized. A new cohort of students is accepted three times a year (Fall, Winter and Summer starts). Please see the attached academic calendar that is utilized in 2022-2023. The calendar demonstrates that federal holidays are observed. Our final examinations are held in weeks 15 and 16 of the academic semester. The chiropractic program is 40 months long. This breaks down, into ten 4-month semesters. There are no extended summer breaks, but the program is considered to be 4 academic years in length. The student schedule is 5 days in length with no greater than 35 contact hours per week. Most students are taking 7-8 classes per semester, which results in 22-24 credit hours (not contact hours) per semester. There are over 4400 hours within the program, and this is seen within the attachment titled "Evidence over 4400 hours."

331.9. Student Faculty Ratio

- (a) The full-time equivalent student-faculty ratio shall be at least one full-time professor to every fifteen (15) students enrolled in the school.
- (b) A full-time professor is one who devotes a minimum of 38 hours per week to his academic duties.
- (c) The maximum enrollment for any class in laboratory or clinical work shall be limited to the number which may, by Board standards, sufficiently be trained with the equipment and facilities available in such laboratory clinic.
- (d) All classes and laboratory sessions, including clinics, shall be conducted under the presence and supervision of a full-time professor.
- (e) There shall be one instructor for each twenty-five (25) students in the laboratory and/or clinic courses.

Keiser University's College of Chiropractic Medicine Response:

- a. Currently, there are 141 chiropractic students within the program. There are 14 full time faculty members, which gives the ration of one full time faculty for every 10 students.
- b. Our full-time faculty members are hired under a division called "full-time 40," which suggests that they are working 40 hours per week.
- c. We are working within the ratio that is acceptable for labs/technique classes. We have a maximum of 24 students in each classroom and/or lab setting.
- d. We have our classes and laboratories supervised by full-time faculty.
- e. We are working within the ratio that is acceptable for labs/technique classes. We have a maximum of 24 students in each classroom and/or lab setting.

331.10. Faculty Organization

(a) A faculty shall be organized by departments. Regularly scheduled meetings of the full faculty shall be had to provide a free exchange of ideas concerning:

- (1) The content and scope of the curriculum;
- (2) The teaching methods and facilities;
- (3) Student discipline, welfare and awards;
- (4) Faculty discipline and welfare;
- (5) Committee reports and recommendations;
- (6) Recommendations for the promotion and graduation of students;
- (7) Administration and educational policies; and
- (8) Recommendations to the administrative officers and to the trustees.

(b) The dean shall appoint the following standing committees of which he shall be a member ex officio: admissions and credentials, curriculum, clinic, laboratories, library and examinations, grades and records.

Keiser University College Chiropractic Medicine Response:

a) The faculty is organized based upon basic science, clinical science, and clinical practice. Faculty meetings are scheduled on at least a monthly basis, with minutes documented. There is an agenda sent previously to the faculty, and time within the agenda that allows for a free exchange of professional concerns, accolades, announcements, etc. Currently there are 7 chiropractic committee organizations in which the following items are discussed:

(1) The content and scope of the curriculum- There is a Curriculum Committee, consisting of 5 faculty members, one student and the Vice President (a member ex officio), that specifically addresses these concerns on at least a monthly basis. Meeting minutes are taken, and any recommendations to administration are given to the Vice President of the Chiropractic College.

(2) The teaching methods and facilities- During the monthly faculty meeting, and written in weekly reports by each faculty, items concerning both the teaching methods, and/or facilities are discussed.

(3) Student discipline, welfare and awards; The faculty are meeting with their own student advisees on an individual basis. They will discuss any significant challenges that their students are having during the monthly faculty meeting.

(4) Faculty discipline and welfare; There is a Faculty Rank and Promotion committee, and the full faculty meeting that reviews any challenges or concerns that faculty may have in this area.

(5) Committee reports and recommendations; The multiple chiropractic program committee's meet monthly and submit recommendations to the Vice President.

(6) Recommendations for the promotion and graduation of students; The faculty within the Retention Committee and the Clinicals Services and Education committees give information about the promotion of students.

(7) Administration and educational policies; and – The faculty have had been part of the creation of the original policies and procedures of the program. They have been given multiple opportunities to give suggestions for new procedures and policies or create addendums to them.

(8) Recommendations to the administrative officers and to the trustees – The faculty during the faculty meetings, and during individual committee meetings are free to make suggestions to the Vice President, and then she is able to take the suggestions to the Campus President.

(b) The Vice President has appointed several different standing committees, and acts as a ex officio member on each. There are programmatic committees, and then institutional committees that our faculty members are part of. For example, at the chiropractic/programmatic level the standing committee's include: Assessment, Curriculum, Clinical Sciences and Services, Admissions, Research, and Faculty Rank and Promotion Committees. In addition, the

chiropractic program is part of Keiser University in which they have campus committees such as: Retention, Admissions, and Interprofessional.

331.11. Scholastic Regulations

(a) Admission.

(1) Each school shall have a committee on admissions and credentials. The admission of students shall be in the hands of a responsible officer who is a member of the committee and his decision shall be subject to the approval of the committee.

Keiser University College of Chiropractic Medicine Response:

1. The Doctor of Chiropractic Program (DCP) has an active Admission Committee, that works with the Institutional Admissions program directly. The DCP Admissions Chair, will receive the applicants file electronically and in paper format. The Committee will interview the candidate and make a decision between the committee members based upon the Admissions criteria outlined in the catalogs (and on the website).

(2) No applicant shall be admitted to any school until he has been personally interviewed for the purpose of determining his character, scholastic aptitude, mental and physical fitness to study and practice. When a great geographic distance precludes personal interview, the same information, supported by affidavits and photographs, may be substituted for the personal interview.

Keiser University College of Chiropractic Medicine Response:

2. The applicant is never accepted into the DCP program until a successful interview takes place. The applicant also reviews a “technical standards” checklist prior to admissions which identifies the students ability to reach appropriate levels physical and mental wellbeing, and overall character. When the student is unable to attend for an in person interview due to restrictions and/or geographical areas, an online meeting with the use of cameras is performed.

(3) Documentary evidence of preliminary education must be obtained and kept on file. All transcripts of other schools must be obtained directly from such schools.

Keiser University College of Chiropractic Medicine Response:

3. All official transcripts of the applicant and students are kept in the Campus Nexus electronic database.

(4) It is strongly recommended by the Board that an entrance examination compiled and administered by recognized testing agencies (e.g., A.C.T., S.A.T.) be required of all students prior to matriculation in order to prove their ability to do college level work.

(b) Date of Matriculation. No student shall be matriculated at a later date than one week immediately following the advertised date of the commencement of the school term.

(c) Qualifications of Students. No student shall be matriculated in an approved school unless he is of good moral character and is without major physical deficiencies, except as provided in Section 8.1 of the Act.

(d) Professional Education. Students shall not be matriculated in any school approved by the board unless they possess, and submit to the school upon their application for matriculation, either:

- (1) A diploma from a standard high school or other institution of standard secondary school grade evidencing completion by the student of a four (4) year course, or
- (2) A certificate from the board stating that the student has submitted proof, satisfactory to the board, of education equivalent in training power to a high school course. The certificate shall bear a date prior to the applicant's matriculation date in any school approved by the board.
- (3) A student who seeks admission in any school approved by the Board after November 3, 1976, shall be subject to the following: The candidate must have completed, with a satisfactory scholastic record, at least 60 semester hours or an equivalent number of quarter hours in prechiropractic subjects at a college listed in the U.S. Office of Education "Education Directory--Higher Education." The specific prechiropractic subjects and hour requirements shall be in accordance with the standards adopted by the Council on Chiropractic Education.

Keiser University College of Chiropractic Medicine Response:

The chiropractic admission criteria, and criteria for matriculation are outlined within the self-study report to the CCE. The student must meet technical standards throughout their academic education, including good moral character and physical abilities. Two background checks are performed on the student at the entrance into the program and prior to the start of clinicals to assure no significant background check issues are found with out students. The Program meets the aforementioned requirements.

(e) Advanced Standing.

- (1) Applicants for admission to advanced standing shall be required to furnish evidence to the school:
 - (A) That they can meet the same entrance requirements as candidates for the first year class;
 - (B) That courses equivalent in content and quality to those given in the admitting school in the year or years preceding that to which admission is desired have been satisfactorily completed;
 - (C) That the work was done in a chiropractic college acceptable to the committee on admissions of the college; and
 - (D) That the candidate has a letter of recommendation from the dean of the school from which transfer is made.
- (2) Credits for work done in colleges of liberal arts and sciences will be allowed based on the regulations of the Council on Chiropractic Education.
- (3) Credits for basic science subjects on the professional level shall be in accordance with the provisions of the regulations of the Council on Chiropractic Education.
- (4) A student desiring to re-enter the college after a lapse in attendance of one or more years shall fulfill the entrance requirements applying to the class which he seeks to enter. Students whose education was interrupted by service in the armed forces are exempt from this requirement.
- (5) For all such students admitted to advance standing there will be, therefore, on file with the registrar the same documents as required for admission to the first-year class and in addition a certified transcript of work completed, together with a letter of honorary dismissal from the college from which transfer was made.
- (6) No candidate for a degree shall be accepted for less than one full academic year of resident study.

Keiser University College of Chiropractic Medicine Response:

There is a transfer policy that is noted within the Keiser University graduate catalog. Currently, the process includes an audit from the Dean of Academic Affairs of General Education. This academic administrator has over 35 years of experience in "file and transfer audits." Dr. Jennifer Illes, VP, as the content expert in the chiropractic field will review the possible transfer credits based upon class descriptions, school/college accreditation status, and the credentials of the instructor teaching that class. The last year of education must

be done at Keiser University in order for a student to graduate from our Program. Currently, we do not have any students that have decided to be out for over a year (services and non-service related) and then come back into the program, however, the program admissions requirements would remain the same as if a new student.

(f) Attendance. In order to obtain credit for a course, a student shall have been present in class at least 90 percent of the time and shall have received a passing letter grade. When the absence exceeds 10 percent, the student shall be automatically dropped from the class. If the absences have been due to illness or other excusable reasons and if evidence of these reasons can be submitted, the student may apply for readmission through the dean's office and may be given credit for attendance upon the recommendation of his instructor and completion of course requirements. Students shall be required to spend the last academic year of the course in residence in the college which confers the degree.

Keiser University College of Chiropractic Medicine Response:

The current Graduate Catalog language and course syllabi state that the student must attend at least 80% of classes in order to be considered to sit for the final examination(s). The individual instructor has the right to abide by the student code of conduct. It is possible that a student is present for 95% of the class but cannot sit for the exam due to significant professionalism issues identified within the students

(g) Promotion.

(1) Promotion from one school term to another should be by recommendation of the instructors and consent of the committee on credentials or other similar committee. The decision should be based upon careful evaluation of the student's attendance, application; conduct and grades in quizzes and examinations. In other words, the final standing of the student in each subject shall be based upon the composite judgment of the responsible instructors in that department, and not solely upon the result of written examinations.

(2) A student failing in any subject in a school term should be required to repeat the subject.

Keiser University College of Chiropractic Medicine Response:

The Admission Committee and the Retention Committee meet on daily and/or weekly basis to discuss at risk students. In addition, the registrar's along with the course instructor and Vice President (Dr. Illes), are able to identify which students can move forward into the next semesters. Multiple testing situations are provided including lab exams, written papers and discussion, practical exams. A student that fails will be asked to repeat the class.

(h) Requirements for Graduation. The requirements for admission to the school shall have been fulfilled and the candidate, in addition to scholastic qualitative requirements, shall have completed a minimum quantitative requirement of 4,400 hours of instruction in four academic years of nine months each. The last year shall have been spent in the school granting the degree. The candidate shall have complied with all the regulations of the school and be recommended for the degree by the faculty.

Keiser University College of Chiropractic Medicine Response:

The requirements are met for the aforementioned graduates. In addition, all of our candidates for matriculation will have needed a bachelors degree prior to graduation.

(i) Special (Graduate of An Approved Chiropractic School) or Unclassified Subject. Persons so registered may not be a candidate for a degree. If they desire to become candidates, they shall satisfy the usual requirements for admission as well as the degree requirement. No work done under this classification will be accepted for credit beyond 90 days from the date of matriculation. Holders of a valid chiropractic degree are exempt from this requirement.

Keiser University College of Chiropractic Medicine Response:

This has not applied to our students as of yet.

G) Degree. The degree conferred for completion of professional undergraduate work shall be Doctor of Chiropractic (D.C.).

Keiser University College of Chiropractic Medicine Response:

This is the degree that is conferred to our students.

331.12.2. Curriculum

All applicants for licensure shall be required to comply with this section in order to qualify for a California chiropractic license.

(a) Course of Study: Every school shall have a curriculum which indicates objectives, content and methods of instruction for each subject offered.

Keiser University College of Chiropractic Medicine Response:

Each of the 74 total courses offered in the Doctor of Chiropractic Program (DCP), have an approved syllabi which includes objectives, course number, methods of instruction, and outlines of the grading and materials delivered throughout the semester.

(b) Required Hours and Subjects: Each applicant shall offer proof of completion of a course of instruction in a Board approved chiropractic college of not less than 4,400 hours which includes minimum educational requirements set forth in Section 5 of the Act. The course of instruction completed by the applicant shall consist of no less than the following minimum hours, except as otherwise provided:

Group I	Anatomy, including embryology, histology and human dissection	616 hours
Group II	Physiology (must include laboratory work)	264 hours
Group III	Biochemistry, clinical nutrition, and dietetics	264 hours
Group IV	Pathology, bacteriology, and toxicology	440 hours
Group V	Public health, hygiene and sanitation, and emergency care	132 hours
Group VI	Diagnosis, including E.E.N.T. and serology, dermatology and sexually transmitted disease, geriatrics, X-ray interpretation	
Group VII	Obstetrics, gynecology, and pediatrics	132 hours
Group VIII	Principles and practice of chiropractic to include chiropractic technique, philosophy, orthopedics, x-ray technique and radiation protection	
Clinic, including office procedure		518 hours
Physiotherapy		120 hours
Psychiatry		32 hours
Electives		660 hours

Keiser University College of Chiropractic Medicine Response:

Currently, we are meeting the hours of the described groups with some minor exceptions:

1. We do not have 660 hours of true electives. Our program is in its infancy of 6 years and we are interesting in strengthening the program's core prior to adding elective classes in. In general, topics like culinary medicine, public health, Florida laws and rules, and contemporary practices in health care could be seen by a third party as an elective-like class. We have plans in the future to add in electives like dermatology, and acupuncture,

advanced pediatrics, however with the small class sizes this is not financially feasible at this time.

2. We have no physiology labs. After consulting with multiple other CCE-approved universities and colleges, many of them also do not have laboratory components. If essential the DCP is willing to add in the labs to the program. We currently have over 5000 contact hours (i.e. 600 more than was is the minimum), adding additional lab components will cause the students to be in class nearly more than 40 hours/week.

(c) Subject Presentation: Laboratory teaching with actual student participation shall be included in human dissection, histology, chemistry, physiology, bacteriology, pathology, X -ray and physiotherapy. Each school shall have and use at least one phantom or equivalent equipment for X -ray class and other courses as may be necessary for adequate teaching. Classes shall be presented in proper academic sequence. Each student shall be taught micro and gross anatomy, human dissection, and physiology before pathology; biochemistry before or concurrent with physiology; and diagnosis before or concurrent with the study of pathology. Clinic hours shall be taken only after a student completes all hours in or concurrently with diagnosis.

Keiser University College of Chiropractic Medicine Response:

Laboratory components are found in gross anatomy, neuroscience, nutrition, and biochemistry (within the basic sciences). Student discussion and interaction is found within pathology, physiology and microbiology, however no true “lab” component is seen on the schedule. Microbiology is taught concurrently with pathology 2, but prior to pathology 1. Clinical hours are taken once the student is completed the diagnostic classes.

- (1) ANATOMY: To include gross anatomy, human dissection, embryology and histology.
- (2) PHYSIOLOGY: To include the physiology of blood and lymph, circulation, respiration, excretion, digestion, metabolism, endocrines, special senses and nervous system.
- (3) BIOCHEMISTRY AND NUTRITION: Biochemistry to include the chemistry of foods, digestion, and metabolism. Nutrition to include dietetics and clinical nutrition in the prevention and treatment of illnesses.
- (4) PATHOLOGY AND BACTERIOLOGY: Pathology to include general and special pathology. Bacteriology to include parasitology and serology.
- (5) PUBLIC HEALTH, HYGIENE, SANITATION AND EMERGENCY CARE: To include sanitary and hygienic procedures, First Aid, minor surgery, prevention of disease, and Public Health Department regulations.
- (6) DIAGNOSIS: To include physical, clinical, laboratory and differential diagnosis; E.E.N.T., geriatrics, serology, dermatology, syphilology, roentgenology (technique and interpretation) and the rules and regulations of the Radiologic Technology Certification Committee of the State Department of Health Services.
- (7) OBSTETRICS, GYNECOLOGY AND PEDIATRICS: To include the standard routine diagnostic procedures and clinical and laboratory examinations.
- (8) PRINCIPLES AND PRACTICE OF CHIROPRACTIC, DIETETICS, PHYSIOTHERAPY, AND OFFICE PROCEDURE: To include history and principles of chiropractic, spinal analysis, adjustive technique of all articulations of the body, orthopedics and patient counseling in curriculum subject matters.

(9) PHYSIOTHERAPY: To be eligible for licensure, each applicant must furnish proof satisfactory to the Board of successful completion of the required 120 hours of physiotherapy course work and additional clinical training in which the theory, principles and use of the standard recognized physiotherapy equipment and procedures were demonstrated to and used by the applicant. This shall include a minimum of thirty (30) patient office visits in which physiotherapy procedures are performed by the student on their own clinic patients. If physiotherapy course work is not offered by the chiropractic college where the student matriculated, the required instruction and clinical training in physiotherapy may be completed at another Board-approved chiropractic college, provided such course is a regular credit course offered primarily to matriculated students. Physiotherapy course work not completed prior to graduation from chiropractic college may be fulfilled by course work taken subsequent to graduation at a Board-approved chiropractic college in conjunction with clinical training in physiotherapy offered by that college. Such course work and clinical training must be regular credit course work and clinical training offered primarily to matriculated students.

Keiser University College of Chiropractic Medicine Response:

We offer all of the aforementioned classes (items #1-8) above and include the topics covered within the area of specialty. We have 2 physical therapy classes in which the students have both lecture and lab components. Both of these classes total 150 hours. We have a rehabilitative section to our clinical space, and many students perform rehabilitative care with the patients. Within the next version of our clinical manual (to be released in the Fall of 2022) we will be adding a statement to include at least 30 office visits which include physical therapy.

(10) OFFICE PROCEDURE: To include private office and case management, the writing and completion of reports and forms for insurance claims, and the provisions, rules and regulations of the Chiropractic Act, and the Radiologic Technology Certification Committee of the State Department of Health Services.

Keiser University College of Chiropractic Medicine Response:

The students are exposed to private practices in semester 1, in a program called the Clinical Observation Program. They have the ability to stay within the clinic (inside of the school) or pending grades (and other items) they may be able to intern at a VA, DOD or private practice location where they also learn these office procedures.

(d) Additional Hours and Subjects: It is recommended that a school offer elective subjects, including chiropractic meridian therapy, counseling, hypnotherapy and biofeedback. The school may offer and require for graduation courses of more than 4,400 hours.

Keiser University College of Chiropractic Medicine Response:

Currently, as mentioned earlier, the DCP offers no electives.

(e) Clinics: Each student shall be provided with actual clinical experience in the examining, diagnosing, and treatment of patients. Such clinical experience shall include spinal analysis, palpation, chiropractic philosophy, symptomatology, laboratory diagnosis, physical diagnosis, Xray interpretation, postural analysis, diagnostic impressions, and adjusting of various articulations of the body, psychological counseling and dietetics. Individual case files on each patient together with a record of dates and treatments given and student treating shall be kept and available to the board for inspection.

Keiser University College of Chiropractic Medicine Response:

The DCP can provide samples and examples that the clinical sites are offering all of the items listed above except psychological counseling. In the state of Florida, chiropractors are not able to render psychology care or management including counseling services. Students are taught to diagnosis through history and outcome assessment tools possible psychological disorders so that they can co-manage with the appropriate mental health care provider.

Clinical hours, as described in this section, including those relating to physiotherapy, must be completed in a clinic operated or supervised by a chiropractic college. Each student shall be required to complete, as a minimum for graduation, the following:

- (1) Twenty-five (25) physical examinations of which at least ten (10) are of outside (not student) patients. A physical examination shall include an evaluation of all vital signs, case history, orthopedic and neurological testing. Students shall also have practical clinical laboratory training, including twenty-five (25) urinalyses, twenty (20) complete blood counts (CBCs), ten (10) blood chemistries, and thirty (30) X-ray examinations. Students shall perform ten (10) proctological and ten (10) gynecological examinations. Proctological and gynecological examinations may be performed on a phantom approved by the Board. Gynecological and proctological examinations not completed prior to graduation may be completed after graduation at a Board-approved chiropractic college.

Keiser University College of Chiropractic Medicine Response:

Within the Clinical Manual, these items are listed (or a greater value of the recommendations above) are listed. The DCP requests approval from the Board to approve their pelvic and proctologic phantom models.

- (2) Students shall perform a minimum of two hundred and fifty (250) patient treatments (visits), including diagnostic procedures, chiropractic adjustive technique and patient evaluation.
- (3) Written interpretation of at least thirty (30) different X-ray views, either slide or film, while a senior in the clinic, in addition to other classroom requirements which shall include the spinal column, all other articulations of the body, and soft tissue.
- (4) Minimum of five hundred eighteen (518) hours of practical clinical experience (treating patients in the clinic).

Keiser University College of Chiropractic Medicine Response:

Items listed above as #2-4 are not currently being done within the course syllabi and Clinic manual of the student's clinical classes. There is not quantifying number of patient treatments set forward by the CCE, and this is the accrediting body that we first utilized when creating our numbers for matriculation. We have multiple assignments (like # of new patient examinations, number of re-evaluations, etc.) but currently not an overall quantity. The DCP is willing to change this if needed.

331.13. Physical Facilities

(a) General: Each school shall own, or enjoy the assured use of a physical plant large enough to accommodate classrooms, lecture rooms, laboratories, a clinic, a library and administrative and faculty offices. Each school shall meet and maintain the standards and requirements established by or under the authority of the laws of the State of California governing educational institutions and all applicable city and county ordinances wherein the school is located and shall maintain competent evidence of such compliance, for examination by the Board.

Keiser University (KU) College of Chiropractic Medicine Response:

Physical Location (owned):

The DCP is located within KU's West Palm Beach campus which provides over 70,000 square feet of classrooms, laboratories and offices. The campus consists of 2 large buildings separated by a covered walkway. The physical address of the school is:

Keiser University
2085 & 2081 Vista Parkway
West Palm Beach, FL
33411

Both buildings contain 38 classrooms, 15 medical laboratories, five computer laboratories, a library, career center, student lounges (one for the DCP students only, and one for veterans) and a large auditorium (fits 100 people). Appendix D18 depicts a sampling of the different programs at the WPB campus and the classrooms in which the classes are held. The 2081 building is where most of the chiropractic classes and gatherings take place. In this facility there is a chiropractic student lounge, to be used for studying and time spent between classes. The NBCE takes place in building 2081 for Parts I-IV and physiotherapy. In addition, the DCP students and faculty often use these areas of building 2081 Vista Parkway for their academic classes:

- 1 teaching clinic (1st floor)
- 5 clinical skills laboratories and (1st and 3rd floors)
- 7 classrooms (1st and 3rd floors)
- Gymnasium (for DCP 867 class only- for the physical rehabilitation class) (2nd floor)
- PTA clinical lab (2nd floor)
- Research Room (3rd floor)

Laboratories are equipped with 24 Ergostyle ES-2000 chiropractic tables, 2 flexion-distraction tables, including a computerized force-sensing Cox-8 Technique table, and multiple large plinths. Each lab is equipped with a working sink and essential cleaning products. Our chiropractic tables are annually serviced and have received certificates of compliance. A floor plan of third level is provided, notable most would classify this physical area, the "chiropractic department". A chiropractic teaching clinic, in its third year of operation, is located on the ground floor of building 2081. The clinic's website, including information about hours of operation, appointments, and special events can be found online at www.kuspinecare.com.

Physical resources within the clinic include:

- a separate entrance for patients,
- a reception room,
- a clinician's offices,

- five treatment rooms,
- a rehabilitation room,
- a digital radiography room

(b) Administrative Offices: The administrative offices shall provide adequate office space for faculty members: There shall be space available for faculty conferences. All furnishings shall be serviceable and functional and there shall be sufficient office equipment, subject to Board approval, to efficiently manage the business of the school. There shall be fireproof storage for all records and documents required by the Chiropractic Initiative Act, statute, or regulations. All administrative offices shall meet the standards and requirements incorporated by subparagraph (a) above.

Keiser University College of Chiropractic Medicine Response:

Every chiropractic full time faculty member has ample space for their offices. All administrative office are substantive and contained locked filing cabinets.

(c) Classrooms: There shall be sufficient number and size of classrooms to separately accommodate the graded classes in 1st, 2nd, 3rd and 4th year classes. No two or more subjects shall be taught in the same classroom simultaneously. No two or more student classes (1st, 2nd, 3rd and 4th year) shall be taught in the same classroom simultaneously. Classrooms shall be located where there is quiet and freedom from interruption and distraction. All classrooms shall be furnished with audio-visual aids appropriate to the subject matter being taught, and desks and chairs or tablet armchairs. There shall be effective shades to darken rooms equipped with visual projection apparatus. All classrooms shall meet the standards and requirements incorporated by subparagraph (a) above.

Keiser University College of Chiropractic Medicine Response:

Classrooms are all held in areas that are not in excessive noise volume, and quiet without distraction. There is no more than 1 class at one time within any classroom at any given time. Every classroom is equipped with a projector, camera, and either white board and/or smart board technology. There is ability to darken the rooms by closure of window blinds and/or lights off.

(d) Laboratories: Laboratories shall be well lighted and ventilated and shall be equipped for the practical work in human dissection, histology, chemistry, physiology, bacteriology, pathology, laboratory diagnosis, roentgenology, physiotherapy and chiropractic technique. Anatomy and pathology laboratories shall contain standard equipment. No more than ten (10) students shall be assigned per table. Sinks should be equipped with wrist action or foot pedal valves, and supplied in a sufficient number. Human cadavers and specimens for individual and small group demonstrations shall be supplied. If human cadavers are not available, or state law prohibits their use, schools must obtain prior written approval from this Board. Microscopic laboratories shall have one microscope and one desk light for each two (2) students in the class.

Chiropractic technique laboratories shall be equipped with one chiropractic adjusting table for every four (4) students in the class. Actual student experience with X -ray phantom or equivalent for all areas of the body shall be necessary. Additionally, all laboratories shall meet the standards and requirements incorporated in subparagraph (a) above.

Keiser University College of Chiropractic Medicine Response:

There are no live cadaver labs used within the program. The use of 2 Anatomage tables suffices the use of no more than 10 students surrounding the table at any given time. There are enough tables in each technique class for 2 students per table.

(f) Teaching Aids and Equipment: For the subject of physiotherapy there shall be sufficient generally recognized equipment for classroom and clinic purposes (to include sine galvanic, ultrasound, diathermy, ultraviolet, heat, cold, percussion, and transaction). For the practical work and physical diagnosis students shall be required to own the ordinary and usual diagnostic instruments, including, but not limited to, thermometers, stethoscopes, sphygmomanometers, oto-ophthalmoscope examination sets, and orthopedic-neurological examination instruments. Each school shall own and teach the use of the current standard diagnostic instruments and a list of same shall be made available to the Board upon request. For classroom demonstration and visual education aids, each school shall own charts, mannequins, skeletons, bone collections, anatomical and embryological models, stereopticons, balopticons, micro-projections, and video players or similar projection equipment. The film and slide library shall be constantly augmented by the addition of new material.

Keiser University College of Chiropractic Medicine Response:

The physical modalities lab includes cold laser (levels 3 and 4), heat, ice, percussion, taping, ultrasound, cupping, and various electrical stimulation modalities. Students are required to purchase their own doctor's bags, which a list of doctor tools is provided to them during their first orthopedic class. A list will be available upon request. There are many different anatomical models, and impressive shared resources with the nursing department (ex. Labor and delivery sim models). No film and slide library exists currently at Keiser University within the chiropractic department, however this can be provided if necessary. The students opted to use electronic devices, such as ipads and new technology in place of the film and slides.

(g) Library: A library shall be provided for the use of the student body. The minimum requirements for a library are:

- (1) Operation of the library shall be under the direct supervision of a full-time librarian holding a degree in library science.
- (2) The library shall be open to students a minimum of eight (8) hours per day. It shall have room available for study purposes to accommodate at least ten (10) percent of the enrolled students at one time. Hours shall be posted.
- (3) The library volumes shall be cataloged, using a generally accepted system.
- (4) The library shall consist of a minimum of 5,000 volumes of which 2,000 shall be less than ten years of age. Only cataloged scientific volumes which are of interest to the published curriculum of the school can be counted as library volumes. Unbound journals and periodicals shall not be counted in determining compliance with this rule.
- (5) Each school shall conduct a program of student orientation as to the use of the library and class assignments involving the use of the library.

Keiser University College of Chiropractic Medicine Response:

The librarian is managed by Mr. Timothy Guillen has a Masters degree in library science. The library is open at least 8 hours per day. During the first day new student orientation, Mr. Guillen presents a section about the library resources and then the student will tour the school and library at the end of the end. The library is also heavily utilized as many of our students use the “board review” texts. Keiser University has an extensive online database, which is utilizes more often than paper books within our program. Every mandatory textbook for all 74 classes is located within the library.

(h) Clinic: Each school shall operate a general out-patient clinic where the senior students will obtain actual experience, practical knowledge and skill in:

(1) Diagnosis, including physical examination, palpation, spinal analysis, clinical pathological, laboratory findings, X-ray, and tentative and working diagnoses.

Keiser University College of Chiropractic Medicine Response:

The attached self-study report that was submitted to the CCE in the winter of 2022, described in details the meta-competancies that match the CCE standards to the objectives and outcomes of the classes. There is an internal clinic that works with outpatients, and had been open for the past 3 years (the program itself is 6 years in age).

(2) Adjustive technique, dietetics, and psychotherapy for the care or prevention of disease in accordance with Section 7 of the Act. Such a clinic shall at all times be under the supervision of clinician who meets the standards of the Council on Chiropractic Education. The minimum requirements of a clinic are:

(A) A reception room with a minimum seating capacity for ten (10) persons.

(B) A minimum of five (5) patient dressing rooms that are equipped with at least curtains to ensure privacy.

(C) An administration area wherein at least one full-time secretary shall be located and patient files shall be maintained.

(D) A minimum of one (1) office for each faculty member supervising the clinic with a minimum of two (2) such offices.

(E) Separate lavatories for men and women with a minimum of one (1) each.

(F) A minimum of one (1) physical examination room for every ten (10) students concurrently present and enrolled in the clinic.

(G) A minimum of one (1) chiropractic adjusting table for every five (5) students performing adjustments on clinic patients with a minimum of five (5) such tables.

H) A minimum of one (1) X-ray examination room that is equipped with at least one (1) Xray machine that has a capacity of no less than 125 KV plus 300 M.A. There shall also be an Xray developing room that is equipped with the appropriate and necessary film processing equipment as required by the Board. This room may be an area within the Xray procedure room or shall be located in the immediate area in the same building of such X-ray procedure room. A list of minimal X-ray equipment which shall be used must be obtained from the Board.

(I) A lab room equipped with a sterilization facility, unless waived in writing by the Board.

(J) In addition to the requirements of section 331.12(e), each student's work, conduct, reliability and personality shall be evaluated in writing by his or her supervising teacher and such evaluation shall become a part of the student's record and shall be available for inspection by the Board. (i) Operation and Maintenance of the Physical Plant. In addition to the requirement of subparagraph (a) above, each school shall operate and maintain all physical equipment in good repair. Lockers shall be available for student use.

Keiser University College of Chiropractic Medicine Response:

In addition to the information provided in item #1 of the physical resource section, the clinic reception can fit 10 people safely. Each patient room has a divider and a door that can be locked for privacy as the patient changes. There is one full time receptionist that work 40-50 hours weekly, and we are in the process of hiring another part-time receptionist. There are 4 supervising clinicians, with 4 clinical spaces that are used for offices. There are currently about 42 students within the clinical setting and 5 patient rooms. Separate restrooms for men and ladies exist. There are 8 chiropractic tables within the clinic (8 tables x 5 max/student = 40 maximum students). However, an over-flow room exists next to the clinic in which student patients (for the 8th semester student clinic) may utilize (with room dividers). In this room there are over 12 tables. The tables and all of the physical modalities are serviced annually, and on an as needed basis throughout the year if needed. Locker space is not currently available, since the students use “cupboards” in their student cubicles for storage. If necessary the program is willing to purchase lockers.

Currently, there is no lab room within the clinic. The Keiser University chiropractic program would like to request a waiver from the Board (in writing) for the absence of this area.

There is a state-of the art radiograph room that meets all of the requirements necessary to take images safely in Florida state. It does take images digitally, so the clinic is in absence of processors and developers. The machine meets the above listed requirements for quality of imaging. These films are digitized read by the clinicians, students and also our faculty DACBR (Dr. Dombrowsky).



**Agenda Item 5
December 9, 2022**

**Review, Discussion, and Possible Recommendation Regarding Chiropractic
College Curriculum Requirements (California Code of Regulations, Title 16,
section 331.12.2)**

Purpose of the Item

The Committee will review and discuss the current chiropractic college curriculum requirements, including the prescriptive requirement that students perform a minimum of 250 patient treatments, including diagnostic procedures, chiropractic adjustive technique, and patient evaluation.

Action Requested

The Committee will be asked to discuss the public comments received on this topic and consider whether any changes may be necessary.

Background

The Board's current college curriculum requirements are contained in California Code of Regulations (CCR), title 16, section 331.12.2 (Attachment 2). On July 16, 2020, the Board approved proposed regulatory language to discontinue these prescriptive requirements for applicants who matriculated after 2020, and instead, mandate that colleges ensure all graduates have completed the minimum educational requirements identified in Section 5 of the Chiropractic Initiative Act. This regulatory package is being developed by staff.

At the October 3, 2022 Licensing Committee meeting and October 7 and 27, 2022 Board meetings, a student from Life Chiropractic College West asked the Board to consider granting partial credit for patient visits where an examination is conducted but an adjustive technique is not performed.

At this meeting, the Committee is asked to discuss the current curriculum requirements and the public comments that have been received on this issue and determine whether any additional changes may be necessary to the proposed language that was previously approved by the Board.

Attachments

1. Public Comments Received at October Licensing and Board Meetings Regarding CCR, Title 16, Section 331.12.2
2. California Code of Regulations, Title 16, Section 331.12.2
3. Proposed Regulatory Language for Approval of Chiropractic Colleges and Educational Requirements

COMPLAINT SUBMISSION DISCLAIMER - NOTICE ON COLLECTION OF PERSONAL INFORMATION

Collection and Use of Personal Information.

The Department of Consumer Affairs and the Board of Chiropractic Examiners (BCE) collects the information requested on this form to follow up on your complaint.

Providing Personal Information Is Voluntary.

You do not have to provide the personal information requested. If you do not wish to provide personal information, such as your name, home address, or home telephone number, you may remain anonymous. However, the BCE Enforcement Unit may not be able to contact you and/or assist you in resolving your complaint.

Access to Your Information.

You may review the records maintained by the BCE that contain your personal information, as permitted by the Information Practices Act. See below for contact information.

Possible Disclosure of Personal Information.

We make every effort to protect the personal information you provide us. In order to follow up on your complaint, however, we may need to share the information you give us with the chiropractor you complained about or with other government agencies. This may include sharing any personal information you gave us.

The information you provide may also be disclosed in the following circumstances:

In response to a Public Records Act request, as allowed by the Information Practices Act;

To another government agency as required by state or federal law;

In response to a court or administrative order, a subpoena, or a search warrant.

Contact Information

For questions about the Department of Consumer Affairs privacy policy or the Information Practices Act, contact the Office of Privacy Protection, 1625 N. Market Blvd., Sacramento, CA 95834, or email dca@dca.ca.gov.

COMPLAINT FORM

The Board of Chiropractic Examiners (Board) regulates the chiropractic profession in California and enforces the provisions of the Chiropractic Initiative Act of California, Business and Professions Code, and California Code of Regulations relating to the practice of chiropractic.

All complaints submitted to the Board are reviewed by the Enforcement Unit. Complaints involving allegations of sexual misconduct, fraud, use of drugs or alcohol, or gross negligence/incompetence are given priority attention.

Please be aware that the Board is unable to obtain monetary restitution on behalf of a patient. In addition, the Board has no jurisdiction over fee/billing disputes, general business practices, or personal conflicts.

To file a complaint, complete this complaint form, upload a copy of your authorization form and any supporting documentation you may have (or mail these items to the Board's office after you submit your complaint), and click the "Submit" button.

Subject (Person Complaint Filed Against)

First Name:

Middle Name:

Last Name:

Suffix:

License No.:

Practice Name:

Practice Address:

Street Line 1:

Street Line 2:

City:

State:

Zip:

Phone Number:

Email:

Complainant (Person Filing Complaint)

I wish to remain anonymous. I understand that by filing an anonymous complaint, the Board will not be able to contact me to gather additional information regarding my complaint, and I will not be notified of the status or outcome of my complaint.

First Name:

Falkyn

Middle Name:

Last Name:

Luouxmont

Suffix:

Mr.

Address:

Street Line 1:

Street Line 2:

City:

State:

Zip:

Phone:

Phone Type:

Email:

Communication Preference for Complaint Correspondence:

Email Mail

Patient Information

First Name:

Middle Name:

Last Name:

Suffix:

Patient's Date of Birth:

Your Relationship to Patient:

This section does not apply to my complaint.

Nature of the Complaint

Check the box(es) that best describes the nature of your complaint:

- Substandard Care (Misdiagnosis, negligent care, excessive or unnecessary treatment, delay in treatment, injured by treatment, treatment causing side effects, etc.)
- Unprofessional Conduct
- Office Practice (Failure to provide records to patient, inaccurate billing, etc.)
- False/Misleading Advertising
- Provider Impairment (Under the influence of drugs or alcohol, mental or physical impairment)
- Sexual Misconduct/Harassment
- Fraud
- Unlicensed Activity (Aiding and abetting unlicensed practice, unlicensed provider)
- Other

Please Specify:

Details of the Complaint

Type of Illness or Injury/Reason for Appointment:

Measurements that provide indication for no subluxation and no adjustment force to apply, and how this indication should count toward state board graduation requirements.

Date(s) of Visit(s):

2021-current

State your complaint in chronological order and in detail. It is important that you be specific regarding any allegations against the chiropractor. Providing a comprehensive narrative of your complaint allows for a more expeditious review process. You may also upload a copy of your statement in the Supporting Documentation section below.:

For whom this request/inquiry might involve,

Currently, I am a student/health clinic intern for Life Chiropractic College West in Hayward, CA. As an intern within the student health clinic, I understand the requirements that are needed to progress through it, including the number of chiropractic adjustments used to signal my progress. The option to practice as an intern within a particular modality has been made available to me. This particular modality that I have chosen for my internship is NUCCA, the National Upper Cervical Chiropractic Association and its protocol.

The NUCCA protocol utilizes measures from the Anameter to detect the Atlas Subluxation Complex Syndrome within units of partial degrees and 1/2" sensitivity, which is a procedural format in accordance with the National Institute of Health. As an intern of the health center, I meet with my patient at office visit appointments at least as often as any other intern would meet with their patient for any other modality type (diversified technique, for example) at about once per week.

The difference between modalities has been found to be significant during my experience as an intern at the health center. Specifically, the parameters used within the diversified technique to indicate a vertebral subluxation and permit its subsequent adjustment application, without the use of standards units of measurement, like the partial degree and 1/2" sensitivity that NUCCA implements for its own protocol, allows the intern that utilizes the diversified technique protocol to progress through clinic with the adjustment credit that is required for advancement. The problem is this: there is no guarantee that if that same patient who was analyzed with the diversified technique was instead analyzed with the NUCCA protocol that the subluxation indication would match. On the contrary, I have found more often than not, that a patient's measurements indicate no subluxation detected and therefore no adjustment force to apply is needed.

Is the experience gathered via NUCCA's protocol on par with the value of the

experience gathered by the diversified technique's protocol? For example, how else can the patient learn that applying a destructive force, like the chiropractic adjustment is, might commit further injury instead of their own betterment? Currently, since the no-adjustment office visit does not count toward the credit that an intern needs to progress through the school's health clinic, it seems like NUCCA's protocol is not valued as much as the current standard that brings credence to the diversified technique instead.

It is this discrepancy that I feel is paramount to address directly. I do not think it makes sense that it seems that an intern who adopts the NUCCA protocol seems burdened, even penalized, not rewarded for their efforts and findings for providing care for their patient's health.

It is my request that an amendment be made to the current standards that govern a student of chiropractic's progress through the clinical program. It is my hope that the change that is made recognizes the alternate approach to doctor-patient interventions. Perhaps there is no need to adjust the 250 chiropractic adjustment requirement that the state board currently has for students to graduate. Instead, my request would be to implement an option for students who choose the route of clinical care that the NUCCA protocol provides instead. And to demonstrate a NUCCA intern's ability to perform the current standard of 250 adjustments, besides what is gained particularly through the NUCCA protocol, a separate proctored test be implemented in lieu of what is applied on patients.

Please contact me for further inquiry and direction you might have about this case. I am approaching the start of my outpatient clinic internship experience, and would like the regulations placed upon this timed trial to be optimized for what I consider a worthy chiropractic protocol standard.

Has the patient been examined or treated by another health professional for this same condition?:

Yes No

Health Professional

Add New Health Professional								
First	Last	Street Line 1	Street Line 2	City	State	Zip	Phone	Action

What is your expected resolution regarding this complaint? (Your response will not alter the Board's decision.):

Amendment to current chiropractic student regulation.

Have you filed this complaint with any other organization or government entity?:

Yes No

Please Specify:

Life Chiropractic College West

Witness Information

Witness

Add New Witness								
First	Last	Street Line 1	Street Line 2	City	State	Zip	Phone	Action

Supporting Documentation

Provide a copy of any supporting documents you may have in your possession pertaining to your specific complaint against the chiropractor. Documents may include patient records, photographs, audio or video recordings, correspondence, billing statements, proof of payments, court documents, etc.

Drop file(s) here to upload or click here to browse and select file(s) to upload.

- I do not have any supporting documentation.
- I will mail my documentation to the Board's office.

Please Specify:

I have my current patient's clinical records that I will provide upon request for reference on actual

Signature and Date

NOTICE: Except for the name of the chiropractor, all information requested is voluntary, but failure to provide the requested information may delay or prevent the investigation of your complaint. Information on this form will be used in part to determine whether a violation of state law has occurred. If a violation is substantiated, the information may be transmitted to other governmental agencies, including the Attorney General's Office.

Signature:

[Redacted Signature]

Date:

08/25/2022

From: [REDACTED]
To: Ah.Po.Amanda@DCA; DCA_ChiroInfo@DCA
Subject: Written public comment to the Board on agenda item [6. Public Comment for Items Not on the Agenda] for Board Consideration
Date: Friday, September 23, 2022 5:40:20 PM

WARNING: This message was sent from outside the CA Gov network. Do not open attachments unless you know the sender: [REDACTED]

For whom this applies,

Here is what is written in the current regulations:

https://www.chiro.ca.gov/laws_regs/regulations.pdf

“§331.12.2. Curriculum.

(e) Clinics. Each student shall be provided with actual clinical experience in the examining, diagnosing, and treatment of patients. Said clinical experience shall include spinal analysis, palpation, chiropractic philosophy, symptomatology, laboratory diagnosis, physical diagnosis, X-ray interpretation, postural analysis, diagnostic impressions, and adjusting of various articulations of the body, psychological counseling, dietetics and physical therapy. Individual case files on each patient together with a record of dates and treatments given and student treating shall be kept and available to the board for inspection.

Clinical hours, as described in this section, including those relating to physiotherapy, must be completed in a clinic operated or supervised by a chiropractic college.

Each student shall be required to complete, as a minimum for graduation, the following:

(...)

(2) Students shall perform a minimum of two hundred and fifty (250) patient treatments (visits), including diagnostic procedures, chiropractic adjustive technique and patient evaluation.”

Within the 3 minutes allowed for this public comment, I will request for an addendum to clarify the definition of “patient treatments (visits)” in Item (2).

Currently, the interpretation is this:

A patient treatment (visit) must include all 3 elements of

1. Diagnostic procedures
2. Chiropractic adjustive technique
3. Patient evaluation

to be counted as a single patient treatment (visit).

The proposed addendum is this:

If Diagnostic procedures find that no subluxation is indicated, thereby cancelling any subsequent chiropractic adjustive technique, then the patient encounter is counted as a *partial* patient treatment (visit).

The point of the addendum request is to recognize that these *partial* patient treatments (visits) do still count as “actual clinical experience” as defined in §331.12.2. (e), and therefore a student should receive a partial point reward for it that counts toward the 250 patient treatments (visits) minimal requirement.

It would be a misinterpretation of our profession if it is thought that the inclusion of Diagnostic

procedures and a patient evaluation, with no chiropractic adjustive technique applied equates to no benefit toward the patient's health.

Thank you for this space.

Farewell,

Falkyn Luouxmont

Student Intern at Life Chiropractic College West

[REDACTED]

[REDACTED]

email:

[REDACTED]

Sent from [Mail](#) for Windows

From: [REDACTED]
To: DCA_ChiroInfo@DCA; [Ah Po, Amanda@DCA](mailto:Ah_Po_Amanda@DCA)
Subject: RE: 10.7.2022 BCE Board meeting - Written Public Comment submission
Date: Wednesday, October 5, 2022 11:19:20 AM

WARNING: This message was sent from outside the CA Gov network. Do not open attachments unless you know the sender: [REDACTED]

For whom this applies,

Please also consider this addition for my written public comment submission for the 10.7.2022 BCE board teleconference:

Scenario: My patients keep returning for weekly or monthly office visit check-ins. The measures for some of these patients often find that no subluxation is present for them. However, consequently, as a student (not as the doctor who facilitates me as their intern), I am left with a de facto loss – I receive none of the required clinic experience points for providing no chiropractic adjustment, despite performing the required diagnostic procedures and evaluation needed to ascertain the data that directs against the chiropractic adjustment for that given visit. Nonetheless, these patients still comply and return for the next visit to check if the prior subluxation-clearance held. Please allow for partial clinical experience points to remedy this scenario.

1. I have notified the Council on Chiropractic Education about this addendum request.
2. I have notified the WASC Senior College and University Commission about this addendum request.
3. I have notified Life Chiropractic College West about this addendum request.
4. I will provide them with updates regarding this matter.
5. Besides me and Amanda, who else from the licensing committee can be assigned to the efforts made for this endeavor?
6. A goal is to accomplish as much as possible before the next licensing committee teleconference on 12.7.2022, with my next scheduled checkpoint email/phone call with Amanda on 10.17.2022.
7. I am not currently sponsored nor funded by any party to participate in this endeavor.

Many thanks for your consideration and farewell,
Falkyn Luouxmont
Student Intern at Life West
[REDACTED]

From: [REDACTED]
Sent: Monday, October 3, 2022 1:38 PM
To: chiro.info@dca.ca.gov; [Ah Po, Amanda@DCA](mailto:Ah_Po_Amanda@DCA)
Subject: 10.7.2022 BCE Board meeting - Written Public Comment submission

For whom this applies,

The text here is a reprint from the submission made for the licensing committee as a public

comment on 10.3.2022 during the teleconference.

I humbly ask that this item remain on the agenda list for further development.

Many thanks,

Falkyn Luouxmout

Here is what is written in the current regulations:

https://www.chiro.ca.gov/laws_regs/regulations.pdf

“§331.12.2. Curriculum.

(e) Clinics. Each student shall be provided with actual clinical experience in the examining, diagnosing, and treatment of patients. Said clinical experience shall include spinal analysis, palpation, chiropractic philosophy, symptomatology, laboratory diagnosis, physical diagnosis, X-ray interpretation, postural analysis, diagnostic impressions, and adjusting of various articulations of the body, psychological counseling, dietetics and physical therapy. Individual case files on each patient together with a record of dates and treatments given and student treating shall be kept and available to the board for inspection.

Clinical hours, as described in this section, including those relating to physiotherapy, must be completed in a clinic operated or supervised by a chiropractic college.

Each student shall be required to complete, as a minimum for graduation, the following:

(...)

(2) Students shall perform a minimum of two hundred and fifty (250) patient treatments (visits), including diagnostic procedures, chiropractic adjustive technique and patient evaluation.”

Within the 3 minutes allowed for this public comment, I will request for an addendum to clarify the definition of “patient treatments (visits)” in Item (2).

Currently, the interpretation is this:

A patient treatment (visit) must include all 3 elements of

1. Diagnostic procedures
2. Chiropractic adjustive technique
3. Patient evaluation

to be counted as a single patient treatment (visit).

The proposed addendum is this:

If Diagnostic procedures find that no subluxation is indicated, thereby cancelling any subsequent chiropractic adjustive technique, then the patient encounter is counted as a *partial* patient treatment (visit).

The point of the addendum request is to recognize that these *partial* patient treatments (visits) do still count as “actual clinical experience” as defined in §331.12.2. (e), and therefore a student should receive a partial point reward for it that counts toward the 250 patient treatments (visits) minimal requirement.

It would be a misinterpretation of our profession if it is thought that the inclusion of Diagnostic procedures and a patient evaluation, with no chiropractic adjustive technique applied equates to no benefit toward the patient’s health.

Thank you for this space.

Farewell,

Falkyn Luouxmont

Student Intern at Life Chiropractic College West

[REDACTED]

[REDACTED]

email: [REDACTED]

From: [REDACTED]
To: [Ah Po, Amanda@DCA](mailto:Ah.Po.Amanda@DCA); [DCA, ChiroInfo@DCA](mailto:DCA.ChiroInfo@DCA)
Subject: RE: Public comment submission for the Full Board member teleconference 10.26-10.27.2022 confirmation
Date: Wednesday, October 26, 2022 7:30:29 AM

WARNING: This message was sent from outside the CA Gov network. Do not open attachments unless you know the sender: [REDACTED]

For whom this concerns, please add this to the written public comment submission for the Full Board member teleconference 10.27.2022 about the §331.12.2.(e)(2) BCE Rules and Regulations addendum request:

Marcy Ramsey, Visit Process Manager of WASC Senior College and University Commission, states that their team members will receive communication via a confidential account provided to Life Chiropractic College West. They will not respond to this item individually. However, this information will be considered as their team undertakes its work and develops recommendations to the institution.

Many thanks for your consideration and farewell,
Falkyn Luouxmont
[REDACTED]

Sent from [Mail](#) for Windows

From: [REDACTED]
Sent: Sunday, October 23, 2022 2:15 PM
To: [Ah Po, Amanda@DCA](mailto:Ah.Po.Amanda@DCA); [DCA, ChiroInfo@DCA](mailto:DCA.ChiroInfo@DCA)
Subject: RE: Public comment submission for the Full Board member teleconference 10.26-10.27.2022 confirmation

For whom this concerns, please add this to the written public comment submission for the Full Board member teleconference 10.27.2022:

I anticipate the discussion regarding the rules and regulations edit for §331.12.2.(e)(2) might encounter inquiry with it. Here is another question that might serve the effort. I have proceeded with my own response. However, please pardon me for my credence since I am only an intern practicing chiropractic as a student at Life West's health center.

3. If an actual point allocation is the obligation of the Board of Chiropractic Examiners, and not the obligation of subsequent executives, such as the executives at the chiropractic college level, then what would the point allocation be for the partial patient treatment (visit)?

Response:

If the Diagnostic Procedures and the patient evaluation performed on a patient find that no

subluxation is indicated, thereby cancelling any subsequent chiropractic adjustive technique applied onto the patient, then the patient encounter is counted as a partial patient treatment (visit) and the student should receive a third of 1 point (1/3 point) toward the 250 patient treatment (visit) point minimum requirement portion needed for graduation.

Many thanks for your consideration and farewell,
Falkyn Luouxmout
[REDACTED]

From: [REDACTED]
Sent: Monday, October 17, 2022 2:21 PM
To: [Ah Po, Amanda@DCA](mailto:Ah.Po.Amanda@DCA); [DCA, ChiroInfo@DCA](mailto:DCA,ChiroInfo@DCA)
Subject: RE: Public comment submission for the Full Board member teleconference 10.26-10.27.2022 confirmation

For whom this concerns, please add this to the written public comment submission for the Full Board member teleconference 10.27.2022:

1. S. Ray Bennett, Vice President for Accreditation & Operations of CCE, has indicated that the CCE need not be involved with the efforts made on the §331.12.2.(e)(2) BCE Rules and Regulations addendum request. Therefore, communications with the CCE about this item may cease, and the licensing committee can proceed without CCE.

Many thanks for your consideration and farewell,
Falkyn Luouxmout
[REDACTED]

From: [REDACTED]
Sent: Monday, October 17, 2022 11:09 AM
To: [Ah Po, Amanda@DCA](mailto:Ah.Po.Amanda@DCA); [DCA, ChiroInfo@DCA](mailto:DCA,ChiroInfo@DCA)
Subject: RE: Public comment submission for the Full Board member teleconference 10.26-10.27.2022 confirmation

For whom this concerns, please add this to the written public comment submission for the Full Board member teleconference 10.27.2022:

1. S. Ray Bennett, Vice President for Accreditation & Operations, will liaison for the Council on Chiropractic Education (CCE) about efforts made on the §331.12.2.(e)(2) BCE Rules and Regulations addendum request.
2. On 10.19.2022, a representative from Western Association of Schools and Colleges (WASC-WSCUC) will meet at Life Chiropractic College West to also receive intel made about efforts made on the §331.12.2.(e)(2) BCE Rules and Regulations addendum request.

About today 10.17.2022, no additional comment has been received for discussion to prepare for the next Licensing Committee teleconference where the minutes regarding this matter will be submitted.

Many thanks for your consideration and farewell,
Falkyn Luouxmont

[REDACTED]

From: [REDACTED]

Sent: Sunday, October 9, 2022 3:31 PM

To: [Ah Po, Amanda@DCA](mailto:Ah.Po,Amanda@DCA); [DCA, ChiroInfo@DCA](mailto:DCA,ChiroInfo@DCA)

Subject: RE: Public comment submission for the Full Board member teleconference 10.26-10.27.2022 confirmation

Hi,

For whom this concerns, please add this to the written public comment submission for the Full Board member teleconference 10.26-10.27.2022.

I anticipate the discussion regarding the rules and regulations edit for §331.12.2.(e)(2) might encounter inquiry with it. Here are a couple of questions that might be asked. I have proceeded with my own responses. However, please pardon me for my credence since I am only an intern practicing chiropractic as a student at Life West's health center.

1. How much partial credit should be rewarded for this instance?

Response: The establishment for these details should be handled after the passage of the policy change is made. The point of the edit is to allow recognition of what is deemed as clinical experience and what is not deemed as clinical experience. Because there is a wide variety of modalities that exist under the chiropractic umbrella, separate cases should be created for the actual point allocation - which might be better suited at the college executive level for that determination.

2. What is the definition of sublaxation?

- It is ultimately a pragmatic claim that includes objective measures and subjective observation to account for the complex nature of the human health system. It must however include the approval of necessary authorities to check on the validity of those statements.

- An example is, but not limited to, a student intern practicing within the NUCCA protocol, to reach the conclusion that no sublaxation is found for a particular patient encounter visit:

- a. It must include consent from the patient to be analyzed by x-ray (for a pattern listing), the Anatomometer (sensitive to 1/8th inches and ¼ rotational degrees), and a supine leg-check (for length inequalities),
- b. It must be the confirmation finding of the intern,
- c. It must be the confirmation finding of the doctor facilitating the intern,
- d. It must adhere to the protocol of the NUCCA organization that the doctor is certified with,
- e. It must be the same NUCCA protocol that is in accordance and earned approval with the National Institute of Health for the diagnostic procedures that NUCCA uses.

For the public comment on 10.26-10.27.2022, I will also report to The Board whether or not the Licensing Committee has made any other preparatory efforts prior to delivering the official words for the minutes to be submitted at the 12.9.2022 Licensing Committee teleconference meeting.

Many thanks for your consideration and farewell,
Falkyn Luouxmont

From: [REDACTED]
Sent: Friday, October 7, 2022 3:32 PM
To: [Ah Po, Amanda@DCA](mailto:Ah.Po,Amanda@DCA)
Subject: RE: Public comment submission for the Full Board member teleconference 10.26-10.27.2022 confirmation

Hi Amanda,

This is great news. Any preparations by the Licensing Committee staff prior to 12/09/2022 should make for productive discussion for the allocated minutes at the meeting. For instance, could the proposed language be submitted to the Board or should there be edits made to the proposal? Here is that proposal for reference:

§331.12.2.(e)(2) Addendum proposal:

“If the Diagnostic Procedures and evaluation performed on a patient find that no subluxation is indicated, thereby cancelling any subsequent chiropractic adjustive technique applied onto the patient, then the patient encounter is counted as a partial patient treatment (visit) and the student should receive partial credit toward the 250 patient treatment (visit) minimum requirement portion needed for graduation.”

Since there will be a review of the minutes from 10.7.2022’s teleconference at the 10.27 teleconference and an opportunity to submit another public comment for items not on the agenda, perhaps it is possible for me to report to the Board then whether or not this proposed addendum’s language needs further edits or it is ready for the Board’s official review for it – in which case, the Licensing Committee Meeting on 12.9.2022 can be utilized to further process the order. Any additional note added from The Board at the 10.27 teleconference should expedite 12.09.2022’s discussion.

I will check with you on 10.17.2022 as planned just in case there are any chime ins from staff about this item. I will plan to submit another public comment for the allocated minutes at the 10.27 teleconference – I will either report to The Board that the proposal draft language was accepted as is for The Board to review or the proposal draft language was not yet accepted for The Board to review.

Farewell,
Falkyn

From: [Ah Po, Amanda@DCA](mailto:AhPo_Amanda@DCA)

Sent: Friday, October 7, 2022 2:34 PM

To: [REDACTED]

Subject: RE: Public comment submission for the Full Board member teleconference 10.26-10.27.2022 confirmation

Hi Falkyn,

The Board has heard your public comments.

As you know, a board member requested the Licensing Committee discuss the topic you raised during your public comment at a future Licensing Committee meeting. The topic has been tentatively placed on the schedule for the next Licensing Committee Meeting on 12/09/2022.

The Board cannot discuss issues unless they are an item on the agenda at a public meeting. Therefore I recommend you look to the [Board Meetings page](#) for meeting dates and agendas. Please plan on attending the Licensing Committee meetings to keep apprised of the Board's action/decision(s) regarding your public comment.

Sincerely,

Amanda (Campbell) Ah Po

Enforcement Analyst

[Board of Chiropractic Examiners](#)



1625 N. Market Blvd., Suite N-327

Sacramento, CA 95834

Office: (916) 263-5355

Fax: (916) 327-0039

Amanda.AhPo@dca.ca.gov

(she/her)

This email message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

From: [REDACTED]

Sent: Friday, October 7, 2022 10:49 AM

To: Ah Po, Amanda@DCA <Amanda.AhPo@dca.ca.gov>

Subject: Public comment submission for the Full Board member teleconference 10.26-10.27.2022 confirmation

WARNING: This message was sent from outside the CA Gov network. Do not open attachments unless you know the sender: [REDACTED]

Hi Amanda,

It has come to my attention that public comments might be accepted for submission for the full board teleconference on 10.26-10.27. I inquire only because I noticed that it was an option made available for the previous teleconference on 8.19.2022's agenda: To review minutes from the 8.4.2022 teleconference and To submit public comments for items not on the agenda.

If this is correct, then I will also plan to be present for 10.26-10.27's teleconference or simply only the day that allocates space for the submission and review of previous minutes, which seems like it will be 10.27.2022.

I would inquire about any efforts made from a review of minutes from 10.7.2022's teleconference minutes today and I would submit another public comment on the edit request for 10.26-10.27's minutes.

That would schedule us for these rendezvouses:

10.7.2022

10.17.2022

10.26 or 10.27.2022

12.9.2022

Would you please confirm and advise me as necessary for this point?

Many thanks and farewell,

Falkyn

California Code of Regulations, Title 16, Section 331.12.2

§ 331.12.2. Curriculum.

All applicants for licensure shall be required to comply with this section in order to qualify for a California chiropractic license.

(a) Course of Study: Every school shall have a curriculum which indicates objectives, content and methods of instruction for each subject offered.

(b) Required Hours and Subjects: Each applicant shall offer proof of completion of a course of instruction in a Board-approved chiropractic college of not less than 4,400 hours which includes minimum educational requirements set forth in Section 5 of the Act. The course of instruction completed by the applicant shall consist of no less than the following minimum hours, except as otherwise provided:

Group I	Anatomy, including embryology, histology and human dissection	616 hours
Group II	Physiology (must include laboratory work)	264 hours
Group III	Biochemistry, clinical nutrition, and dietetics	264 hours
Group IV	Pathology, bacteriology, and toxicology	440 hours
Group V	Public health, hygiene and sanitation, and emergency care	132 hours
Group VI	Diagnosis, including E.E.N.T. and serology, dermatology and sexually transmitted diseases, geriatrics, X-ray interpretation, and neurology	792 hours
Group VII	Obstetrics, gynecology, and pediatrics	132 hours
Group VIII	Principles and practice of chiropractic to include chiropractic technique, chiropractic philosophy, orthopedics, X-ray technique, and radiation protection	430 hours
	Clinic, including office procedure	518 hours
	Physiotherapy	120 hours
	Psychiatry	

	32 hours
Electives	660 hours
<i>Total</i>	<i>4,400 hours</i>

(c) Subject Presentation: Laboratory teaching with actual student participation shall be included in human dissection, histology, chemistry, physiology, bacteriology, pathology, X-ray and physiotherapy. Each school shall have and use at least one phantom or equivalent equipment for X-ray class and other courses as may be necessary for adequate teaching.

Classes shall be presented in proper academic sequence. Each student shall be taught micro and gross anatomy, human dissection, and physiology before pathology; biochemistry before or concurrent with physiology; and diagnosis before or concurrent with the study of pathology. Clinic hours shall be taken only after a student completes all hours in or concurrently with diagnosis.

(1) ANATOMY: To include gross anatomy, human dissection, embryology and histology.

(2) PHYSIOLOGY: To include the physiology of blood and lymph, circulation, respiration, excretion, digestion, metabolism, endocrines, special senses and nervous system.

(3) BIOCHEMISTRY AND NUTRITION: Biochemistry to include the chemistry of foods, digestion, and metabolism. Nutrition to include dietetics and clinical nutrition in the prevention and treatment of illnesses.

(4) PATHOLOGY AND BACTERIOLOGY: Pathology to include general and special pathology. Bacteriology to include parasitology and serology.

(5) PUBLIC HEALTH, HYGIENE, SANITATION AND EMERGENCY CARE: To include sanitary and hygienic procedures, First Aid, minor surgery, prevention of disease, and Public Health Department regulations.

(6) DIAGNOSIS: To include physical, clinical, laboratory and differential diagnosis; E.E.N.T., geriatrics, serology, dermatology, syphilology, roentgenology (technique and interpretation) and the rules and regulations of the Radiologic Technology Certification Committee of the State Department of Health Services.

(7) OBSTETRICS, GYNECOLOGY AND PEDIATRICS: To include the standard routine diagnostic procedures and clinical and laboratory examinations.

(8) PRINCIPLES AND PRACTICE OF CHIROPRACTIC, DIETETICS, PHYSIOTHERAPY, AND OFFICE PROCEDURE: To include history and principles of chiropractic, spinal analysis, adjustive technique of all articulations of the body, orthopedics and patient counseling in curriculum subject matters.

(9) PHYSIOTHERAPY: To be eligible for licensure, each applicant must furnish proof satisfactory to the Board of successful completion of the required 120 hours of physiotherapy course work and additional clinical training in which the theory, principles and use of the standard recognized physiotherapy equipment and procedures were demonstrated to and used by the applicant. This shall include a minimum of thirty (30) patient office visits in which physiotherapy procedures are performed by the student on their own clinic patients. If physiotherapy course work is not offered by the chiropractic college where the student matriculated, the required instruction and clinical training in physiotherapy may be completed at another Board-approved chiropractic college, provided such course is a regular credit course offered primarily to matriculated students.

Physiotherapy course work not completed prior to graduation from chiropractic college may be fulfilled by course work taken subsequent to graduation at a Board-approved chiropractic college in conjunction with clinical training in physiotherapy offered by that college. Such course work and clinical training must be regular credit course work and clinical training offered primarily to matriculated students.

(10) OFFICE PROCEDURE: To include private office and case management, the writing and completion of reports and forms for insurance claims, and the provisions, rules and regulations of the Chiropractic Act, and the Radiologic Technology Certification Committee of the State Department of Health Services.

(d) Additional Hours and Subjects: It is recommended that a school offer elective subjects, including chiropractic meridian therapy, counseling, hypnotherapy and biofeedback. The school may offer and require for graduation courses of more than 4,400 hours.

(e) Clinics: Each student shall be provided with actual clinical experience in the examining, diagnosing, and treatment of patients. Such clinical experience shall include spinal analysis, palpation, chiropractic philosophy, symptomatology, laboratory diagnosis, physical diagnosis, X-ray interpretation, postural analysis, diagnostic impressions, and adjusting of various articulations of the body, psychological counseling and dietetics. Individual case files on each patient together with a record of dates and treatments given and student treating shall be kept and available to the board for inspection.

Clinical hours, as described in this section, including those relating to physiotherapy, must be completed in a clinic operated or supervised by a chiropractic college.

Each student shall be required to complete, as a minimum for graduation, the following:

(1) Twenty-five (25) physical examinations of which at least ten (10) are of outside (not student) patients.

A physical examination shall include an evaluation of all vital signs, case history, orthopedic and neurological testing.

Students shall also have practical clinical laboratory training, including twenty-five (25) urinalyses, twenty (20) complete blood counts (CBCs), ten (10) blood chemistries, and thirty (30) X-ray examinations. Students shall perform ten (10) proctological and ten (10) gynecological examinations. Proctological and gynecological examinations may be performed on a phantom approved by the Board. Gynecological and proctological examinations not completed prior to graduation may be completed after graduation at a Board-approved chiropractic college.

(2) Students shall perform a minimum of two hundred and fifty (250) patient treatments (visits), including diagnostic procedures, chiropractic adjustive technique and patient evaluation.

(3) Written interpretation of at least thirty (30) different X-ray views, either slide or film, while a senior in the clinic, in addition to other classroom requirements which shall include the spinal column, all other articulations of the body, and soft tissue.

(4) Minimum of five hundred eighteen (518) hours of practical clinical experience (treating patients in the clinic).

Article 4. Approved Schools and Qualifications of Applicants

§330. Application for Approval of Chiropractic Colleges.

An application for approval on a form provided by the Board, shall be filed with the Board at its principal office in Sacramento ~~and addressed to the Secretary of the State Board of Chiropractic Examiners.~~ Such application shall be on file at least six (6) months prior to any inspection.

The Chiropractic Initiative Act of California (Stats. 1923, p. 1xxxviii). Reference: Sections 4(b), 4(f) and 4(g) Chiropractic Initiative Act.

§330.1 Accrediting Agency

As used in this Article, “accrediting agency” means the Council on Chiropractic Education (or its successor organization) or other chiropractic school and college accrediting agencies employing equivalent standards for accreditation, as specified in Section 4 of the Chiropractic Initiative Act.

§331.1. Approval and Eligibility.

(a) A school which initially meets the requirements of these ~~rules-regulations of the Chiropractic Initiative Act~~ shall be first provisionally approved. No school will ~~be finally receive final approved~~ until a provisional program has been in operation for at least minimum of two (2) years.

(b) No school shall be provisionally approved until it shall present competent evidence of its organizational and financial ability to attain the minimum educational requirements set forth by these ~~rules regulations, the Chiropractic Initiative Act~~ and institutional goals set forth in its application.

~~(c) No school shall be provisionally approved unless there is a reasonable need for such school in the geographical area in which it is proposed to locate.~~

~~(d)~~ (c) No school shall be provisionally approved until competent evidence of compliance with the requirements of Section 29023(a)(2) of the Education Code is filed with the Board.

(d) No school’s application shall be approved for provisional approval by the Board prior to initial accreditation by the Council on Chiropractic Education or another accrediting body approved pursuant to Section 4 of the Chiropractic Initiative Act.

(e) No school shall receive final approval prior to full accreditation by the Council on Chiropractic Education or another accrediting body approved pursuant to Section 4 of the Chiropractic Initiative Act.

§331.3. Supervision.

~~(a) Every approved school shall be under the supervision of a full-time president, dean, or other executive officer who shall carry out the objective and program of the school. Said officer shall have a minimum of two years experience in school administration prior to his appointment, or its equivalent in training.~~

~~(b) The president, dean, or other executive officer shall render a report, annually, covering topics such as including student enrollment, number and changes in faculty and administration, changes in the curriculum, courses given, and the projections for future policy. Said annual report shall be filed with the Board within one (1) month following the end of the academic year.~~

~~(c) It shall be the duty of the president, dean, or other executive officer to obtain from each faculty member, prior to the beginning of the semester or school year, an outline and time schedule for each subject of the course. He shall approve such outlines and determine from time to time if they are being observed. A copy of this outline and a schedule of classes, showing the day and hour of presentation and the instructor shall be filed with the Board within three (3) weeks after the beginning of the term.~~

~~(d) The dean shall maintain a record of the teaching load of each member of the staff in terms of classes taught, supervision, student counseling, committee work, and other assigned activities.~~

~~(e) A permanent file of all class schedules, beginning with those as of the date of the school's approval shall be maintained by the dean. These shall be available for inspection and comparison with the courses described in the relative catalogs.~~

~~(f) Schedules must be kept up to date and posted on a bulletin board available for student inspection.~~

§331.4. Financial Management.

The college shall keep accurate financial records and shall file an annual financial report including a profit and loss statement as well as an asset and liability statement prepared and signed by a qualified accountant. Said financial report shall be filed with the Board within three (3) months following the end of the school's fiscal year.

§331.5. Records.

~~There~~ Each school shall be maintained a good secure system of records, ~~showing conveniently and in detail providing detailed information about,~~ the attendance, discipline, grades and accounts of the students, ~~by means of from which an exact specific knowledge can be obtained~~ regarding each student's work-academic achievement. A personal file must be maintained for each student containing ~~his-the student's~~ admission credentials, photographs and other identifying personal items. ~~Fireproof storage must be provided for the safekeeping of records.~~

§331.6. Catalog. Reserved.

~~The school shall issue, at least biennially, a catalog setting forth the character of the work which it offers and said catalog shall be filed with the Board. The content and format shall follow the usual pattern of professional school catalogs, and shall contain the following information:~~

~~(a) A list of its trustees, president, dean and other administrative officers and members of the faculty with their respective qualifications;~~

~~(b) Courses set forth by department, showing for each subject its content, value in term, semester hours, or credit hours;~~

~~(c) Entrance requirements, conditions for academic standing and discipline, such as attendance, examinations, grades, promotion and graduation;~~

~~(d) Matriculation, tuition, laboratory, graduation and special fees, and estimated costs of books, instruments, dormitory and board; and~~

~~(e) Descriptions of the library, audio-visual facilities, laboratories and clinic facilities setting forth at least the minimum requirement hereinafter set forth in rules.~~

~~(f) No school will be accepted or retained in good standing which publishes in its catalog or otherwise, any misrepresentation regarding its curriculum, faculty or facilities for instruction.~~

§331.7. Calendar Reserved.

~~Each school may elect to use the semester, trimester or four-quarter term system.~~

~~A school calendar shall designate the beginning and ending dates of terms or semesters, the vacation periods and legal holidays observed, and the dates for semester and final examinations. The recitation or lecture period shall be not less than 50 minutes in length. The school may operate on a five or six-day week or any combination thereof, but the total number of hours of instruction shall be not less than 30 hours nor more than 35 hours per week. The total number of hours provided for each complete student's course, leading to the degree of Doctor of Chiropractic, shall be not less than 4,400 hours distributed over four academic years of nine~~

months each.

§331.8. ~~Faculty.~~ Reserved.

All faculty members shall meet the standards of the Council on Chiropractic Education.

§331.9. ~~Student Faculty Ratio.~~ Reserved.

~~(a) The full-time equivalent student faculty ratio shall be at least one full-time professor to every fifteen (15) students enrolled in the school.~~

~~(b) A full-time professor is one who devotes a minimum of 38 hours per week to his academic duties.~~

~~(c) The maximum enrollment for any class in laboratory or clinical work shall be limited to the number which may, by Board standards, sufficiently be trained with the equipment and facilities available in such laboratory clinic.~~

~~(d) All classes and laboratory sessions, including clinics, shall be conducted under the presence and supervision of a full-time professor.~~

~~(e) There shall be one instructor for each twenty-five (25) students in the laboratory and/or clinic courses.~~

§331.10. ~~Faculty Organization.~~ Reserved.

~~(a) A faculty shall be organized by departments. Regularly scheduled meetings of the full faculty shall be had to provide a free exchange of ideas concerning:~~

~~(1) The content and scope of the curriculum;~~

~~(2) The teaching methods and facilities;~~

~~(3) Student discipline, welfare and awards;~~

~~(4) Faculty discipline and welfare;~~

~~(5) Committee reports and recommendations;~~

~~(6) Recommendations for the promotion and graduation of students;~~

~~(7) Administration and educational policies; and~~

~~(8) Recommendations to the administrative officers and to the trustees.~~

~~(b) The dean shall appoint the following standing committees of which he shall be a member ex officio: admissions and credentials, curriculum, clinic, laboratories, library and examinations, grades and records.~~

§331.11. Scholastic Regulations Admissions.

~~(a) Admission.~~

~~(1) Each school shall have a committee on admissions and credentials. The admission of students shall be in the hands of a responsible officer who is a member of the committee and his decision shall be subject to the approval of the committee.~~

~~(2) No applicant shall be admitted to any school until he has been personally interviewed for the purpose of determining his character, scholastic aptitude, mental and physical fitness to study and practice. When a great geographic distance precludes personal interview, the same information, supported by affidavits and photographs, may be substituted for the personal interview.~~

~~(3) Documentary evidence of preliminary education must be obtained and kept on file. All transcripts of other schools must be obtained directly from such schools.~~

~~(4) It is strongly recommended by the Board that an entrance examination compiled and administered by recognized testing agencies (e.g., A.C.T., S.A.T.) be required of all students prior to matriculation in order to prove their ability to do college level work.~~

~~(b) Date of Matriculation. No student shall be matriculated at a later date than one week immediately following the advertised date of the commencement of the school term.~~

~~(c) Qualifications of Students. No student shall be matriculated in an approved school unless he is of good moral character and is without major physical deficiencies, except as provided in Section 8.1 of the Act.~~

~~(d) Professional Education. Students shall not be matriculated in any school approved by the board unless they possess, and submit to the school upon their application for matriculation, either:~~

~~(1) A diploma from a standard high school or other institution of standard secondary school grade evidencing completion by the student of a four (4) year course, or~~

~~(2) A certificate from the board stating that the student has submitted proof, satisfactory to the board, of education equivalent in training power to a high school course. The certificate shall bear a date prior to the applicant's matriculation date in any school approved by the board.~~

~~(3) A student who seeks admission in any school approved by the Board after November 3, 1976, shall be subject to the following: The candidate must have completed, with a satisfactory scholastic record, at least 60 semester hours or an equivalent number of quarter hours in prechiropractic subjects at a college listed in the U.S. Office of Education "Education Directory—Higher Education." The specific prechiropractic subjects and/or requirements shall be in accordance with the standards adopted by the Council on Chiropractic Education.~~

~~(e) Advanced Standing.~~

~~(1) Applicants for admission to advanced standing shall be required to furnish evidence to the school:~~

~~(A) That they can meet the same entrance requirements as candidates for the first year class;~~

~~(B) That courses equivalent in content and quality to those given in the admitting school in the year or years preceding that to which admission is desired have been satisfactorily completed;~~

~~(C) That the work was done in a chiropractic college acceptable to the committee on admissions of the college; and~~

~~(D) That the candidate has a letter of recommendation from the dean of the school from which transfer is made.~~

~~(2) Credits for work done in colleges of liberal arts and sciences will be allowed based on the regulations of the Council on Chiropractic Education.~~

~~(3) Credits for basic science subjects on the professional level shall be in accordance with the provisions of the regulations of the Council on Chiropractic Education.~~

~~(4) A student desiring to re-enter the college after a lapse in attendance of one or more years shall fulfill the entrance requirements applying to the class which he seeks to enter. Students whose education was interrupted by service in the armed forces are exempt from this requirement.~~

~~(5) For all such students admitted to advance standing there will be, therefore, on file with the registrar the same documents as required for admission to the first year class and in addition a certified transcript of work completed, together with a letter of honorary dismissal from the college from which transfer was made.~~

~~(6) No candidate for a degree shall be accepted for less than one full academic year of resident study.~~

~~(f) Attendance. In order to obtain credit for a course, a student shall have been present in class at least 90 percent of the time and shall have received a passing letter grade. When the absence exceeds 10 percent, the student shall be automatically dropped from the class.~~

~~If the absences have been due to illness or other excusable reasons and if evidence of these reasons can be submitted, the student may apply for readmission through the dean's office and may be given credit for attendance upon the recommendation of his instructor and completion of course requirements.~~

~~Students shall be required to spend the last academic year of the course in residence in the college which confers the degree.~~

~~(g) Promotion.~~

~~(1) Promotion from one school term to another should be by recommendation of the instructors and consent of the committee on credentials or other similar committee. The decision should be based upon careful evaluation of the student's attendance, application, conduct and grades in quizzes and examinations. In other words, the final standing of the student in each subject shall be based upon the composite judgment of the responsible instructors in that department, and not solely upon the result of written examinations.~~

~~(2) A student failing in any subject in a school term should be required to repeat the subject.~~

~~(h) Requirements for Graduation. The requirements for admission to the school shall have been fulfilled and the candidate, in addition to scholastic qualitative requirements, shall have completed a minimum quantitative requirement of 4,400 hours of instruction in four academic years of nine months each. The last year shall have been spent in the school granting the degree. The candidate shall have complied with all the regulations of the school and be recommended for the degree by the faculty.~~

~~(i) Special (Graduate of An Approved Chiropractic School) or Unclassified Subject. Persons so registered may not be a candidate for a degree. If they desire to become candidates, they shall satisfy the usual requirements for admission as well as the degree requirement. No work done under this classification will be accepted for credit beyond 90 days from the date of matriculation. Holders of a valid chiropractic degree are exempt from this requirement.~~

~~(j) Degree. The degree conferred for completion of professional undergraduate work shall be Doctor of Chiropractic (D.C.).~~

Schools shall ensure any student granted admission has:

(a) Obtained a high school diploma or equivalent

(b) Completed, the equivalent of at least 60 pre-chiropractic college credits, as required by Section 5 of the Act.

Reference: Sections 5 Chiropractic Initiative Act.

§331.12.1. Curriculum Requirements Prior to November 3, 1976.

All applicants for the Board Examination who matriculated into a chiropractic college prior to the passage of Proposition 15 (November 3, 1976) shall fulfill the requirements of this section.

(a) Course of Study. The school shall have an established curriculum which indicates objectives, content and methods of instruction for each subject offered.

(b) Required Hours and Subjects. The school shall offer, and shall require for graduation, a course of not less than 4,000 academic hours extended over a period of four (4) school terms of not less than nine (9) months each. Such ~~course~~ curriculum shall include the minimum educational requirements set forth in Section 5 of the Act. The minimum number of hours required in the basic subjects shall be as follows:

Anatomy including embryology (minimum of 480 hours), histology (minimum of 160 hours), and dissection (minimum of 160 hours)	800 hours
Physiology	320 hours
Biochemistry, inorganic and organic chemistry	320 hours
Pathology (minimum of 280 hours), bacteriology (minimum of 160 hours), and toxicology (minimum of 40 hours)	480 hours
Public health, hygiene and sanitation, and first aid	120 hours
Diagnosis (minimum of 480 hours), pediatrics (minimum of 40 hours), psychiatry (minimum of 40 hours), dermatology, syphilology and serology (minimum of 40 hours), and X-ray (minimum of 120 hours)	720 hours
Obstetrics and gynecology	120 hours
Principles and practice of chiropractic (minimum of 960 hours), physiotherapy (minimum of 120 hours), and dietetics (minimum of 40 hours)	1,120 hours

(c) Subject Presentation. Laboratory teaching with actual student participation must be included in anatomy, dissection, histology, chemistry, physiology, bacteriology, pathology.

The classes shall be presented in a proper sequence so that the normal shall be presented first before the abnormal is to be considered (i.e., the student must learn anatomy, chemistry and physiology before he is taught pathology and diagnosis). The subject presentation should be of a nature and depth comparable to that found at State colleges in equivalent courses.

ANATOMY: Includes gross anatomy, dissection, embryology, and histology with particular emphasis on neurology.

PHYSIOLOGY: To include the physiology of blood and lymph, circulation, respiration, excretion, digestion, metabolism, endocrines, special senses and nervous system.

CHEMISTRY: To include inorganic and organic chemistry, physical chemistry, the chemistry of foods, digestion and metabolism.

PATHOLOGY AND BACTERIOLOGY: Pathology to include general and special pathology. Bacteriology to include parasitology and serology.

PUBLIC HEALTH AND HYGIENE AND SANITATION: To include sanitary and hygienic procedures, First Aid, prevention of disease and Public Health Department regulations.

DIAGNOSIS: To include physical, clinical, laboratory and differential diagnosis; pediatrics, geriatrics, dermatology, syphilology, psychology, psychiatry and roentgenology (technique and interpretation).

OBSTETRICS AND GYNECOLOGY: To include the standard routine diagnostic procedures, and clinical and laboratory examinations.

PRINCIPLES AND PRACTICE OF CHIROPRACTIC, DIETETICS, PHYSIOTHERAPY, AND OFFICE PROCEDURE: To include history and principles of chiropractic, spinal analysis, adjustive techniques and orthopedics.

NUTRITION: To include dietetics and clinical nutrition, including primary and secondary nutritional deficiencies.

PHYSIOTHERAPY: To include the theory, principles and use of the standard recognized physiotherapy equipment and procedures.

OFFICE PROCEDURE: To include private office and case management, the writing and completion of reports and forms for insurance claims, and the provisions, rules and regulations of the Chiropractic Act.

(d) Additional Hours and Subjects. The school, if it desires, may offer and may require for graduation, course of more than 4,000 hours. Such additional hours may be in elective subjects.

(e) Clinics. Each student shall be provided with actual clinical experience in the examining, diagnosing, and treatment of patients. Said clinical experience shall include spinal analysis, palpation, chiropractic philosophy, symptomatology, laboratory diagnosis, physical diagnosis, Xray interpretation, postural analysis, diagnostic impressions, and adjusting of various articulations of the body, psychological counseling, dietetics and physical therapy. Individual case files on each patient together with a record of dates and treatments given and student treating shall be kept and available to the board for inspection.

§331.12.2. Curriculum Requirements Prior to 2020.

All applicants for licensure who matriculated into a chiropractic college prior to (DATE 2020?) shall be required to comply with this section ~~in order~~ to qualify for a California chiropractic license.

(a) Course of Study: Every school shall have a curriculum which indicates objectives, content and methods of instruction for each subject offered.

(b) Required Hours and Subjects: Each applicant shall offer proof of completion of a course of instruction in a Board-approved chiropractic college of not less than 4,400 hours which includes minimum educational requirements set forth in Section 5 of the Act. The course of instruction completed by the applicant shall consist of no less than the following minimum hours, except as otherwise provided:

Group I	Anatomy, including embryology, histology and human dissection	616 hours
Group II	Physiology (must include laboratory work)	264 hours
Group III	Biochemistry, clinical nutrition, and dietetics	264 hours
Group IV	Pathology, bacteriology, and toxicology	440 hours
Group V	Public health, hygiene and sanitation, and emergency care	132 hours
Group VI	Diagnosis, including E.E.N.T. and serology, dermatology and sexually transmitted diseases, geriatrics, X-ray interpretation, and neurology	792 hours
Group VII	Obstetrics, gynecology, and pediatrics	132 hours
Group VIII	Principles and practice of chiropractic to include chiropractic technique, chiropractic philosophy, orthopedics, X-ray technique, and radiation protection	430 hours
	Clinic, including office procedure	518 hours
	Physiotherapy	120 hours
	Psychiatry	32 hours
Electives		660 hours
		Total 4,400 hours

(c) Subject Presentation: Laboratory teaching with actual student participation shall be included in human dissection, histology, chemistry, physiology, bacteriology, pathology, X-ray and physiotherapy. Each school shall have and use at least one (1) phantom or equivalent equipment for X-ray class and other courses as may be necessary for adequate teaching.

Classes shall be presented in proper academic sequence. Each student shall be taught micro and gross anatomy, human dissection, and physiology before pathology; biochemistry before or concurrent with physiology; and diagnosis before or concurrent with the study of pathology. Clinic hours shall be taken only after a student completes all hours in or concurrently with diagnosis.

(1) ANATOMY: To include gross anatomy, human dissection, embryology and histology.

(2) PHYSIOLOGY: To include the physiology of blood and lymph, circulation, respiration, excretion, digestion, metabolism, endocrines, special senses and nervous system.

(3) BIOCHEMISTRY AND NUTRITION: Biochemistry to include the chemistry of foods, digestion, and metabolism. Nutrition to include dietetics and clinical nutrition in the prevention and treatment of illnesses.

(4) PATHOLOGY AND BACTERIOLOGY: Pathology to include general and special pathology. Bacteriology to include parasitology and serology.

(5) PUBLIC HEALTH, HYGIENE, SANITATION AND EMERGENCY CARE: To include sanitary and hygienic procedures, First Aid, minor surgery, prevention of disease, and Public Health Department regulations.

(6) DIAGNOSIS: To include physical, clinical, laboratory and differential diagnosis; E.E.N.T., geriatrics, serology, dermatology, syphilology, roentgenology (technique and interpretation) and the rules and regulations of the Radiologic Technology Certification Committee of the State Department of Health Services.

(7) OBSTETRICS, GYNECOLOGY AND PEDIATRICS: To include the standard routine diagnostic procedures and clinical and laboratory examinations.

(8) PRINCIPLES AND PRACTICE OF CHIROPRACTIC, DIETETICS, PHYSIOTHERAPY, AND OFFICE PROCEDURE: To include history and principles of chiropractic, spinal analysis, adjustive technique of all articulations of the body, orthopedics and patient counseling in curriculum subject matters.

(9) PHYSIOTHERAPY: To be eligible for licensure, each applicant must furnish proof satisfactory to the Board of successful completion of the required 120 hours of physiotherapy course work and additional clinical training in which the theory, principles and use of the standard recognized physiotherapy equipment and procedures were demonstrated to and used by the applicant. This shall include a minimum of thirty (30) patient office visits in which physiotherapy procedures are performed by the student on their own clinic patients. If physiotherapy course work is not offered by the chiropractic college where the student matriculated, the required instruction and clinical training in physiotherapy may be completed at another Board-approved chiropractic college, provided such course is a regular credit course offered primarily to matriculated students.

Physiotherapy course work not completed prior to graduation from chiropractic college may be fulfilled by course work taken subsequent to graduation at a Board-approved chiropractic college in conjunction with clinical training in physiotherapy offered by that college. Such course work and clinical training must be regular credit course work and clinical training offered primarily to matriculated students.

(10) OFFICE PROCEDURE: To include private office and case management, the writing and completion of reports and forms for insurance claims, and the provisions, rules and regulations of the Chiropractic Act, and the Radiologic Technology Certification Committee of the State Department of Health Services.

(d) Additional Hours and Subjects: It is recommended that a school offer elective subjects, including chiropractic meridian therapy, counseling, hypnotherapy and biofeedback. The school may offer and require for graduation courses of more than 4,400 hours.

(e) Clinics: Each student shall be provided with actual clinical experience in the examining, diagnosing, and treatment of patients. Such clinical experience shall include spinal analysis, palpation, chiropractic philosophy, symptomatology, laboratory diagnosis, physical diagnosis, Xray interpretation, postural analysis, diagnostic impressions, and adjusting of various articulations of the body, psychological counseling and dietetics.

Individual case files on each patient together with a record of dates and treatments given and student treating shall be kept and available to the board for inspection.

Clinical hours, as described in this section, including those relating to physiotherapy, must be completed in a clinic operated or supervised by a chiropractic college.

Each student shall be required to complete, as a minimum for graduation, the following:

(1) Twenty-five (25) physical examinations of which at least ten (10) are of outside (not student) patients.

A physical examination shall include an evaluation of all vital signs, case history, orthopedic and neurological testing.

Students shall also have practical clinical laboratory training, including twenty-five (25) urinalyses, twenty (20) complete blood counts (CBCs), ten (10) blood chemistries, and thirty (30) X-ray examinations. Students shall perform ten (10) proctological and ten (10) gynecological examinations. Proctological and gynecological examinations may be performed on a phantom approved by the Board. Gynecological and proctological examinations not completed prior to graduation may be completed after graduation at a Board-approved chiropractic college.

(2) Students shall perform a minimum of two hundred and fifty (250) patient treatments (visits), including diagnostic procedures, chiropractic adjustive technique and patient evaluation.

(3) Written interpretation of at least thirty (30) different X-ray views, either slide or film,

while a senior in the clinic, in addition to other classroom requirements which shall include the spinal column, all other articulations of the body, and soft tissue.

(4) Minimum of five hundred eighteen (518) hours of practical clinical experience (treating patients in the clinic).

§331.12.3 Curriculum Requirements.

~~All applicants for licensure shall be required to comply with this section in order to qualify for a California chiropractic license.~~

~~Schools shall ensure all graduates have completed the minimum educational requirements identified in Section 5 of the Chiropractic Initiative Act.~~

§331.12.3.4. Eligibility to Take Board Examination.

To be eligible to take the ~~Board~~ examination, ~~as defined in 16 CCR 349(b)(6)~~, each applicant for licensure must furnish proof satisfactory to the Board of meeting all other licensure requirements required by the Board.

§331.13. Physical Facilities. Reserved

~~(a) General: Each school shall own or enjoy the assured use of a physical plant large enough to accommodate classrooms, lecture rooms, laboratories, a clinic, a library and administrative and faculty offices. Each school shall meet and maintain the standards and requirements established by or under the authority of the laws of the State of California governing educational institutions and all applicable city and county ordinances wherein the school is located and shall maintain competent evidence of such compliance, for examination by the Board.~~

~~(b) Administrative Offices: The administrative offices shall provide adequate office space for faculty members.~~

~~There shall be space available for faculty conferences.~~

~~All furnishings shall be serviceable and functional and there shall be sufficient office equipment, subject to Board approval, to efficiently manage the business of the school.~~

~~There shall be fireproof storage for all records and documents required by the Chiropractic Initiative Act, statute, or regulations.~~

~~All administrative offices shall meet the standards and requirements incorporated by subparagraph (a) above.~~

~~(c) Classrooms: There shall be sufficient number and size of classrooms to separately accommodate the graded classes in 1st, 2nd, 3rd and 4th year classes. No two or more subjects shall be taught in the same classroom simultaneously. No two or more student classes (1st, 2nd, 3rd and 4th year) shall be taught in the same classroom simultaneously.~~

~~Classrooms shall be located where there is quiet and freedom from interruption and distraction.~~

~~All classrooms shall be furnished with audio-visual aids appropriate to the subject matter being taught, and desks and chairs or tablet armchairs. There shall be effective shades to darken rooms equipped with visual projection apparatus.~~

~~All classrooms shall meet the standards and requirements incorporated by subparagraph (a) above.~~

~~(d) Laboratories: Laboratories shall be well lighted and ventilated and shall be equipped for the practical work in human dissection, histology, chemistry, physiology, bacteriology, pathology, laboratory diagnosis, roentgenology, physiotherapy and chiropractic technique.~~

~~Anatomy and pathology laboratories shall contain standard equipment. No more than ten (10) students shall be assigned per table. Sinks should be equipped with wrist action or foot pedal valves and supplied in a sufficient number. Human cadavers and specimens for individual and small group demonstrations shall be supplied. If human cadavers are not available, or state law prohibits their use, schools must obtain prior written approval from this Board.~~

~~Microscopic laboratories shall have one microscope and one desk light for each two (2) students in the class.~~

~~Chiropractic technique laboratories shall be equipped with one chiropractic adjusting table for every four (4) students in the class.~~

~~Actual student experience with X-ray phantom or equivalent for all areas of the body shall be necessary.~~

~~Additionally, all laboratories shall meet the standards and requirements incorporated in subparagraph (a) above.~~

~~(f) Teaching Aids and Equipment: For the subject of physiotherapy there shall be sufficient generally recognized equipment for classroom and clinic purposes (to include sine galvanic, ultrasound, diathermy, ultraviolet, heat, cold, percussion, and transaction). For the practical work and physical diagnosis students shall be required to own the ordinary and usual diagnostic instruments, including, but not limited to, thermometers, stethoscopes, sphygmomanometers, oto-ophthalmoscope examination sets, and orthopedic neurological examination instruments. Each school shall own and teach the use of the current standard diagnostic instruments and a list of same shall be made available to the Board upon request. For classroom demonstration and visual education aids, each school shall own charts, mannequins, skeletons, bone collections,~~

~~anatomical and embryological models, stereopticons, balopticons, micro-projections, and video players or similar projection equipment. The film and slide library shall be constantly augmented by the addition of new material.~~

~~(g) Library: A library shall be provided for the use of the student body. The minimum requirements for a library are:~~

~~(1) Operation of the library shall be under the direct supervision of a full-time librarian holding a degree in library science.~~

~~(2) The library shall be open to students a minimum of eight (8) hours per day. It shall have room available for study purposes to accommodate at least ten (10) percent of the enrolled students at one time. Hours shall be posted.~~

~~(3) The library volumes shall be cataloged, using a generally accepted system.~~

~~(4) The library shall consist of a minimum of 5,000 volumes of which 2,000 shall be less than ten years of age. Only cataloged scientific volumes which are of interest to the published curriculum of the school can be counted as library volumes. Unbound journals and periodicals shall not be counted in determining compliance with this rule.~~

~~(5) Each school shall conduct a program of student orientation as to the use of the library and class assignments involving the use of the library.~~

~~(h) Clinic: Each school shall operate a general out-patient clinic where the senior students will obtain actual experience, practical knowledge and skill in:~~

~~(1) Diagnosis, including physical examination, palpation, spinal analysis, clinical pathological, laboratory findings, X-ray, and tentative and working diagnoses.~~

~~(2) Adjustive technique, dietetics, and psychotherapy for the care or prevention of disease in accordance with Section 7 of the Act.~~

~~Such a clinic shall at all times be under the supervision of a clinician who meets the standards of the Council on Chiropractic Education.~~

~~The minimum requirements of a clinic are:~~

~~(A) A reception room with a minimum seating capacity for ten (10) persons.~~

~~(B) A minimum of five (5) patient dressing rooms that are equipped with at least curtains to ensure privacy.~~

~~(C) An administration area wherein at least one full-time secretary shall be located, and patient files shall be maintained.~~

~~(D) A minimum of one (1) office for each faculty member supervising the clinic with a minimum of two (2) such offices.~~

~~(E) Separate lavatories for men and women with a minimum of one (1) each.~~

~~(F) A minimum of one (1) physical examination room for every ten (10) students concurrently present and enrolled in the clinic.~~

~~(G) A minimum of one (1) chiropractic adjusting table for every five (5) students performing adjustments on clinic patients with a minimum of five (5) such tables.~~

~~(H) A minimum of one (1) X-ray examination room that is equipped with at least one (1) Xray machine that has a capacity of no less than 125 KV plus 300 M.A. There shall also be an Xray developing room that is equipped with the appropriate and necessary film processing equipment as required by the Board. This room may be an area within the X-ray procedure room or shall be located in the immediate area in the same building of such X-ray procedure room. A list of minimal X-ray equipment which shall be used must be obtained from the Board.~~

~~(I) A lab room equipped with a sterilization facility, unless waived in writing by the Board.~~

~~(J) In addition to the requirements of section 331.12(e), each student's work, conduct, reliability and personality shall be evaluated in writing by his or her supervising teacher and such evaluation shall become a part of the student's record and shall be available for inspection by the Board.~~

~~(i) Operation and Maintenance of the Physical Plant. In addition to the requirement of subparagraph (a) above, each school shall operate and maintain all physical equipment in good repair.~~

~~Lockers shall be available for student use.~~

§331.14. ~~Quality of Instruction. Reserved~~

~~Nothing herein contained shall constitute any limitation or restriction upon the power of the Board to refuse to approve, or to disapprove, any school if in the opinion of the Board the quality of instruction is not sufficiently high to meet the objective of the State Chiropractic Act or these rules.~~

§331.15. Violations and/or Failure to Comply.

~~(a) Any violation of these rules, or failure to comply with them, shall be grounds to revoke approval of any school, and to refuse approval to any school, or to any applicant.~~

~~(b) If any school provisionally approved or approved by the Board undergoes fundamental~~

~~changes in its administration, organization or stated objectives, provisional approval or approval shall be suspended until such time as the Board again appraises the institution.~~

~~Such changes include but are not limited to change in ownership of the school or its assets or noncompliance with Section 29032(a)(2) of the Education Code.~~

~~(c) In the event an approved school or a school applying for provisional approval fails to maintain or meet the required standards, the institution will be given a bill of particulars and granted 60 days to comply; in the event such corrections are not made within said time, the institution will be removed from the approved list or denied provisional approval.~~

~~(d) Institutions rejected or removed from the approved list may apply for reconsideration or reinstatement in accordance with Rule 331.~~

Violations and/or failures to comply with the accreditation standards of the Council on Chiropractic Education or other accreditation bodies approved by the Board, pursuant to Section 5 of the Initiative Act, regional accreditation bodies, and the rules and regulation set forth by the U.S Department of Education, may be grounds for denial of an application for approval or revocation of approval by the Board.

§331.16.13. Definition of Board.

~~Whenever the Board is used in this article, it shall mean the Board of Chiropractic Examiners unless otherwise indicated.~~



**Agenda Item 6
December 9, 2022**

**Review, Discussion, and Possible Recommendation Regarding the Process for
Licensure Through Reciprocity (Section 9 of the Chiropractic Initiative Act and
CCR, Title 16, section 323)**

Purpose of the Item

The Committee will begin its review and discussion of the requirements and process for licensure in California through reciprocity.

Action Requested

The Committee will be asked to provide feedback and direction to staff on this issue.

Background

Strategic Plan Objective and New Issue #6 from 2022 Sunset Review

The Board's 2022–2026 Strategic Plan contains an objective to review reciprocity requirements to minimize barriers to licensure in California.

In addition, New Issue #6 from the Board's 2022 states:

ISSUE #6: (RECIPROCAL LICENSE REQUIREMENTS) BCE requires applicants that hold active licenses from other states and are seeking license reciprocity in California to have completed training and evaluation equivalent to California requirements. How do California licensing requirements compare to other states? Has the BCE considered revising license reciprocity requirements for candidates holding chiropractic licenses in other states or allow reciprocity with candidates who are licensed in other countries?

Section 9 of the Chiropractic Initiative Act (Issuance of licenses to licensees of other states)

Section 9 of the Act states:

“Notwithstanding any provision contained in any other section of this act, the board, upon receipt of the fee specified in Section 5, shall issue a license to any person licensed to practice chiropractic under the laws of another state, provided said state then had the same general requirements as required in this state at the time said license was issued, and provided that such other state in like manner grants reciprocal registration to chiropractic practitioners of this state.

“The applicant shall also provide a certificate from the other state stating that he was licensed by that state, that he has not been convicted of unprofessional conduct, and that there is no charge of unprofessional conduct pending against him.”

The Board’s interpretation of Section 9 of the Act was adopted into regulation through California Code of Regulations, title 16, section 323 (Attachment 1).

Current Reciprocal License Requirements

To be eligible for licensure as a doctor of chiropractic in California through interstate reciprocity, an applicant must:

- Have graduated from a Board-approved chiropractic college and completed the minimum number of hours and subjects as were required by California law at the time the applicant’s license was issued.
- Completed equivalent successful examination in each of the subjects examined in California in the same year as the applicant was issued a license in the state from which they are applying.
- Hold a valid and up-to-date license in the state from which they are reciprocating and that state must reciprocate with California.
- Have five years of chiropractic practice.
- Take and pass the California Chiropractic Law Examination.
- Pay the non-refundable application fee and the initial licensure fee, if licensure is granted.

At this meeting, the Committee is asked to discuss the Board’s current reciprocity requirements and process.

Attachments

1. California Code of Regulations, Title 16, Section 323
2. Application for Reciprocal License to Practice Chiropractic

California Code of Regulations, Title 16, Section 323

§ 323. Reciprocity. Interpretation of Section 9 of the Act.

The board makes the following interpretation of Section 9 of the Act which states candidates for licensure are considered to have fulfilled the requirement of reciprocity if they provide the documentation required by the board showing the following:

- (a) Graduation from a board approved chiropractic college, and completion of the minimum number of hours and subjects as were required by California law at the time the applicant's license was issued.
- (b) Equivalent successful examination in each of the subjects examined in California in the same year as the applicant was issued a license in the state from which he is applying.
- (c) They must hold a valid and up-to-date license from the state from which they are reciprocating.
- (d) The state from which they are licensed will reciprocate with California.
- (e) The board reserves the right to require any additional education or examination for reciprocity.
- (f) A nonrefundable application fee of \$25.00.
- (g) A fee, as set forth in Section 5 of the Act, if licensure is granted.
- (h) Five (5) years of chiropractic practice.



Application for Reciprocal License to Practice Chiropractic

Before you begin, be sure to read this **IMPORTANT NOTICE** regarding licensure in California through reciprocity. In order to apply for licensure through reciprocity, applicants must first request that a Certification of Licensure and State Endorsement, from the state in which they are licensed, be sent directly to the California Board of Chiropractic Examiners (Board); specifically, page two of the Endorsement **must be completed in full, signed and dated.** Without an Endorsement by the state from which you are reciprocating from, you do not qualify for reciprocal licensure.

You are encouraged to review California Code of Regulations §323 for further reciprocity requirements.

Live scan services for fingerprinting are required for applicants residing in California. The live scan form may be downloaded from the Board's website. Applicants residing in other states must use the standard fingerprint cards, which are furnished by the Board upon request.

Complete the attached reciprocal application; submit it to the Board along with the required attachments and a check or money order in the amount of **\$371.00** made payable to "BOCE". This is a nonrefundable fee. An incomplete application, or one that does not result in licensure within one year from the date of receipt, is considered abandoned.

REQUIRED ITEMS:

The following items are required to complete your application for reciprocal licensure:

- Certification of Licensure and State Endorsement (completed by your current State Board)
- Application form (with current photograph) and appropriate fees
- If you live out-of-state, you must submit rolled fingerprints on fingerprint cards along with a processing fee of **\$49.00**
- Verification of Prechiropractic Hours form; Chiropractic College Certificate form; official transcripts; and photocopy of diploma from chiropractic college. (Must come directly from chiropractic college.)
- Official certification of licensure from any other state where you hold or have held a chiropractic license.
- Examination results showing equivalent successful examination in each of the subjects examined in California in the same year as you were issued a license in the state from which you are applying
- National Board of Chiropractic Examiners (NBCE) official transcript of scores. (*Must be sent directly from the NBCE.*)



RECIPROCAL APPLICATION FOR A CHIROPRACTIC LICENSE

READ all instructions prior to completing this application. **ALL** questions on this application must be answered, and all supporting documents must be submitted as per instructions. When space provided is insufficient, attach additional sheet(s) of paper. All attachments are considered part of the application. If you are an out-of-state applicant, contact our office for the required fingerprint cards. Standard processing time is three to five months.

Application Processing Fee is \$25.00. The fee is non-refundable. Make your check payable to "BOCE".

ALL APPLICANTS ARE REQUIRED TO TAKE AND PASS THE CALIFORNIA LAW & PROFESSIONAL PRACTICES EXAM

Type or print clearly.

NAME: Last		First	Middle
Other names you have used (include maiden name):			
ADDRESS: Number and Street (will be released to the public once you are licensed UNLESS you update with a practice address)			
City		State	Zip Code
Telephone Number (include area code) Home:	Driver's License Number / State		Sex: <input type="checkbox"/> Female <input type="checkbox"/> Male
Work:	Expiration Date:		Are you a U.S. citizen? <input type="checkbox"/> Yes <input type="checkbox"/> No
Date of Birth:	Social Security Number:		

EDUCATIONAL BACKGROUND

Name of High School	Location (City, State)	Date of Graduation or GED earned
---------------------	------------------------	----------------------------------

List all undergraduate schools attended

Dates Attended		Name of college or university (no abbreviations or acronyms)	Location	Date and Degree Earned
From	To			

Chiropractic college/s attended:

Dates Attended		Name of Chiropractic College	Location	Date and Degree Earned
From	To			

Which state are you reciprocating from? _____
(Be sure this state has completed our *Certification of Licensure and State Endorsement* form)

FOR OFFICE USE ONLY
Cashiered Date: _____
Amount Rec'd: _____

1. Have you ever filed an application for chiropractic examination or licensure in California? Yes No
 If "Yes", please give the year and outcome of the previous application:

2. Have you ever been licensed to practice chiropractic in any state, province or territory?..... Yes No

Jurisdiction	License Number	Date of Issuance	Dates of Practice

If "Yes", have each chiropractic agency submit license verification to the CA Board of Chiropractic Examiners

3. Do you hold any other professional license in any state, province or territory?..... Yes No
 If yes: Profession: _____ Issuing Agency: _____ Lic #: _____

Has this license ever been revoked or subject to discipline? Yes No

If you answer "Yes" to questions 4 through 10, provide official documentation regarding the matter in addition to your written personal explanation. If these documents are not provided with the application, they will be requested before your application can be processed.

4. Have you ever withdrawn from, or been suspended, dismissed or expelled from a chiropractic college OR have you ever taken a leave of absence? Yes No

5. Have you ever been charged with, or been found to have committed, unprofessional conduct, professional incompetence, gross negligence, or repeated negligent acts or malpractice by any licensing board, or other agency, or hospital? Yes No

6. Has any disciplinary action ever been filed or taken, including but not limited to, informal or confidential discipline, consent orders, or letters or warning, regarding any healing arts license which you now hold or have ever had? Yes No

7. Is any such action as described above pending? Yes No

8. Has a claim or action for damages ever been filed against you in the course of the practice of chiropractic or any other healing art which resulted in malpractice settlement, judgement, or arbitration award of over \$3,000.00? Yes No

9. Have you ever been denied a license, permission to practice chiropractic or any other healing art, or denied permission to take an examination in any state, territory, country, or U.S. federal jurisdiction, or is any such action pending? Yes No

10. Have you ever voluntarily surrendered a license to practice chiropractic or any other healing arts in this or any other state, or is any such action pending? Yes No

11. Do you have any condition which in any way impairs or limits your ability to practice chiropractic with reasonable skill and safety, including but not limited to, any of the following? Yes No

If "Yes", check the appropriate box(es):

- A condition which required admission to an inpatient psychiatric treatment facility
- Alcohol or chemical substance dependency or addiction
- Emotional, mental or behavioral disorder
- Other (explain): _____

Applicant Initial Here

FOR THE FOLLOWING QUESTIONS, YOU ARE REQUIRED TO LIST ANY CONVICTION THAT HAS BEEN SET ASIDE AND DISMISSED OR EXPUNGED, OR WHERE A STAY OF EXECUTION HAS BEEN ISSUED. TRAFFIC VIOLATIONS OF \$500 OR LESS NEED NOT BE REPORTED.

12. Have you ever been convicted or pled guilty or pled nolo contendere to ANY violation (include every misdemeanor or felony) of any local, state, or federal law of any state, territory, country, or U.S. federal jurisdiction? Yes No

13. Is any criminal action related to the above pending? Yes No

If you answered "Yes" to questions 12 or 13, attach a written DETAILED explanation, obtain a copy of the arrest report and include CERTIFIED copies of all court documents for each conviction. Include proof of completion of any terms of probation.

SPECIAL ACCOMMODATIONS

14. Do you have a disability or impairment for which you may need assistance during the written California Law & Professional Practice Examination? Yes No

If "Yes", describe the nature of your disability and the accommodations you are requesting?

Attach the following:

- Current documentation from a doctor, psychologist, psychiatrist, or other appropriate professional certifying you disability

PHOTOGRAPH AND PERSONAL IDENTIFICATION

Attach a current photograph of yourself in the space provided. The picture should have been taken no longer than 6 months ago.

Attach photograph here.

No larger than the box.

Hair Color: _____

Eye Color: _____

Height: _____

Weight: _____

Physical marks, scars, or tattoos:

Applicant Initial Here

NOTICE: Falsification or misrepresentation of any item or response on this application or any attachment hereto is a sufficient basis for denying or revoking a license.

Application Declaration / Signature

I hereby certify under penalty of perjury under the laws of the State of California to the truth and accuracy of the foregoing information contained on this application, including any attachments. I also certify that I personally completed this application and have read the instructions.

Signature of Applicant: _____
(Please Sign Full Name, not initials)

Signed on this _____ day of _____
MONTH YEAR

Mail your application, attachments and fees to:

State of California
Board of Chiropractic Examiners
1625 N. Market Blvd., Ste N-327
Sacramento, California 95834
916-263-5355

INFORMATION COLLECTION AND ACCESS

The information requested herein is mandatory and is maintained by the Board of Chiropractic Examiners, 901 P Street, Suite 142A Sacramento, CA 95814, Executive Officer, (916) 263-5355, in accordance with Section 5 of the Chiropractic Initiative Act of California and Sections 331.12.1 and 331.12.2 of Article 4 of Title 16, California Code of Regulations. Except for Social Security numbers, the information requested will be used to determine eligibility. Failure to provide all or any part of the requested information will result in the rejection of the application as incomplete. Disclosure of your social security number is mandatory and collection is authorized by §30 of the Business and Professions Code and Pub. L 94-455 (42 U.S.C.A. §405(c)(2)(C)). Your Social Security number will be used exclusively for tax enforcement purposes, for compliance with any judgment or order for family support in accordance with Section 17520 of the Family Code, or for verification of licensure or examination status by a licensing or examination board, and where licensing is reciprocal with the requesting state. If you fail to disclose your Social Security number, you may be reported to the Franchise Tax Board and be assessed a penalty of \$100. Each individual has the right to review the personal information maintained by the agency unless the records are exempt from disclosure. Your name and address listed on this application will be disclosed to the public upon request if and when you become licensed.

NOTICE: Effective July 1, 2012, the State Board of Equalization and the Franchise Tax Board may share taxpayer information with the board. You are obligated to pay your state tax obligation and your license may be suspended if the state tax obligation is not paid.



**Agenda Item 7
December 9, 2022**

**Review, Discussion, and Possible Recommendations Regarding the
Renewal Requirements and Fees for Inactive Licenses (CCR, Title 16, sections
370 and 371)**

Purpose of the Item

The Committee will review and discuss the current requirements and fees for inactive doctor of chiropractic licenses.

Action Requested

The Committee will be asked to discuss this topic and provide direction to staff.

Background

Business and Professions Code (BPC) section 700 establishes an inactive category of health professionals' licensure which is intended to allow a healing arts licensee who is not actively engaged in the practice of their profession, to maintain licensure in a nonpracticing status.

Currently, licensees with an inactive license are exempt from the Board's continuing education requirements but must renew their license annually and pay the same \$313 license renewal fee as those with an active license. Effective January 1, 2023, the annual renewal fee for active and inactive licenses will increase to \$336.

[Senate Bill 1031 \(Ochoa Bogh, 2022\)](#) [Healing arts boards: inactive license fees] would have required the renewal fee for an inactive license issued by a Department of Consumer Affairs healing arts board to be half the amount of the fee for renewal of an active license, unless the board establishes a lower fee. However, this bill was held in committee and did not move forward in 2022.

At this meeting, the Committee is asked to discuss the current renewal requirements and fees for inactive doctor of chiropractic licenses and provide direction to staff on this issue.

Attachment

- California Code of Regulations, Title 16, Sections 370 and 371

California Code of Regulations, Title 16, Sections 370 and 371

§ 370. License Renewal Fees.

The following represents fees for license renewals:

- (a) Annual license renewal for active and inactive licenses: \$250
- (b) License restoration for forfeited and cancelled licenses: double the annual renewal fee
- (c) Inactive to active status license renewal: same as the annual license renewal fee

§ 371. Annual License Renewals and Restoration.

- (a) This section shall apply to non-disciplinary license renewal and restoration. Disciplinary license restoration conditions are defined in Section 1000-10 of the Business and Professions Code (Chiropractic Initiative Act of California, Stats. 1923 p.1xxxviii).
- (b) A license shall expire annually on the last day of the licensee's birth month. For purposes of this section, the following terms have the following meanings:
 - (1) "License in forfeiture" is a license that has not been renewed within 60 days following its expiration date.
 - (2) "Inactive license" has the meaning specified in Business and Professions Code 700.
 - (3) "Cancelled license" is a license that has been expired for a period of three (3) consecutive years.
- (c) To renew an active license, a licensee shall complete and submit a "Renewal" form (R1HDC, Rev. 06/11), which is incorporated by reference, pay the appropriate fee specified in Section 370(a) prior to the expiration date of the license, and complete the board's continuing education requirements that were in effect during the license renewal period.
- (d) To renew an inactive license, a licensee shall complete and submit a "Renewal" form (R1HDC, Rev. 06/11) and pay the appropriate fee specified in Section 370(a) prior to the expiration date of the license.
- (e) To renew and restore a license in forfeiture, a licensee shall complete and submit a "Forfeiture Notice" form (D1HDC, Rev. 06/11) and an "Application for Restoration of

License” form (Revision date 04/11), which are incorporated by reference, pay the appropriate fees specified in Section 370(b) and have met one of the following continuing education requirements:

(1) Completed the board's continuing education requirements that were in effect at the time of each license renewal period;

(2) Practiced in another state under an active valid license and completed all continuing education requirements for that state for each license renewal period the license was expired;

(3) Passed the National Board of Chiropractic Examiners (NBCE) Special Purposes Examination for Chiropractic examination within six (6) months prior to submitting the Application for Restoration of License.

(f) To restore an inactive license to active status, a licensee shall complete and submit an “Inactive to Active Status Application” form (Revision date 02/10), which is incorporated by reference, pay the appropriate fee specified in Section 370(c) prior to the expiration date of the license, and complete continuing education equivalent to that required for a single license renewal period.

(g) To restore a cancelled license, a licensee shall complete and submit an “Application for Restoration of License” form (Revision date 04/11), pay the appropriate fee specified in Section 370(b), and have met one of the following continuing education requirements:

(1) Completed the board's continuing education requirements that were in effect at the time of each license renewal period;

(2) Practiced in another state under an active valid license and completed all continuing education requirements for that state for each license renewal period the license was expired;

(3) Passed the National Board of Chiropractic Examiners (NBCE) Special Purposes Examination for Chiropractic examination within six (6) months prior to submitting the Application for Restoration of License.

(h) The board will not process incomplete applications nor complete applications that do not include the correct fee as specified in Section 370.

(i) In addition to any other requirement for renewal or restoration of a license, a licensee shall disclose whether, since the last renewal of his or her license, he or she has been convicted of any violation of the law in this or any other state, the United States, or other country. However, licensees are not required to disclose traffic infractions that resulted in fines of less than five hundred dollars (\$500) that did not involve alcohol, dangerous drugs, or controlled substances.



BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR
DEPARTMENT OF CONSUMER AFFAIRS • CALIFORNIA BOARD OF CHIROPRACTIC EXAMINERS

1625 N. Market Blvd., Suite N-327, Sacramento, CA 95834

P (916) 263-5355 | Toll-Free (866) 543-1311 | F (916) 327-0039 | www.chiro.ca.gov



Agenda Item 8
December 9, 2022

Public Comment for Items Not on the Agenda

Purpose of the Item

At this time, members of the public may offer public comment for items not on the meeting agenda.

The Committee may not discuss or take action on any matter raised during this public comment section that is not included on the agenda, except to decide whether to place the matter on the agenda of a future meeting. [Government Code Sections 11125, 11125.7, subd. (a).]



BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR
DEPARTMENT OF CONSUMER AFFAIRS • CALIFORNIA BOARD OF CHIROPRACTIC EXAMINERS

1625 N. Market Blvd., Suite N-327, Sacramento, CA 95834

P (916) 263-5355 | Toll-Free (866) 543-1311 | F (916) 327-0039 | www.chiro.ca.gov



Agenda Item 9
December 9, 2022

Future Agenda Items

Purpose of the Item

At this time, members of the Committee and the public may submit proposed agenda items for a future Committee meeting.

The Committee may not discuss or take action on any proposed matter except to decide whether to place the matter on the agenda of a future meeting. [Government Code Section 11125.]



Agenda Item 10
December 9, 2022

Schedule 2023 Committee Meetings

Purpose of the Item

The Committee will schedule its meetings for 2023.

Action Requested

The Committee will be asked to schedule meetings in spring, summer, and fall 2023.

Background

The Board is scheduled to meet on the following dates in 2023:

- Friday, January 20, 2023
- Thursday, April 20, 2023 through Friday, April 21, 2023
- Thursday, July 20, 2023
- Thursday, October 19, 2023 through Friday, October 20, 2023

During this meeting, the Committee will be asked to schedule meetings prior to the April, July, and October 2023 Board meetings.

Please note the following dates are state holidays:

- Monday, February 20, 2023 – Presidents' Day
- Friday, March 31, 2023 – Cesar Chavez Day
- Monday, May 29, 2023 – Memorial Day
- Tuesday, July 4, 2023 – Independence Day
- Monday, September 4, 2023 – Labor Day



BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR
DEPARTMENT OF CONSUMER AFFAIRS • CALIFORNIA BOARD OF CHIROPRACTIC EXAMINERS
1625 N. Market Blvd., Suite N-327, Sacramento, CA 95834
P (916) 263-5355 | Toll-Free (866) 543-1311 | F (916) 327-0039 | www.chiro.ca.gov



Agenda Item 11
December 9, 2022

Adjournment

Time: _____