

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

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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]