

December 26, 2025

Tomiquia Moss, Secretary
California Business, Consumer Services and Housing Agency
500 Capitol Mall, Suite 1850
Sacramento, CA 95814

Dear Secretary Tomiquia Moss,

In accordance with the State Leadership Accountability Act (Leadership Accountability), the Board of Chiropractic Examiners submits this report on the review of our internal control and monitoring systems for the biennial period ending December 31, 2025.

Should you have any questions please contact Kristin Walker, Executive Officer, at (916) 574-7784, Kristin.Walker@dca.ca.gov.

GOVERNANCE

Mission and Strategic Plan

The Board of Chiropractic Examiners (Board) regulates the chiropractic profession in California and oversees approximately 12,000 licensees. The Board was created on December 21, 1922, as the result of an initiative measure approved by California voters on November 7, 1922.

The Board's mission is to protect the health, welfare, and safety of the public through licensure, education, engagement, and enforcement in chiropractic care. The Board's vision is ensuring California consumers receive high-quality, patient-centered and collaborative care, and its values include collaboration, excellence, professionalism, public protection, and responsiveness. The Board adopted its amended 2022-2026 Strategic Plan in October 2024 with the following goals and objectives:

Goal Area 1: Licensing and Professional Qualification - Ensure the continuous competency of all doctors of chiropractic by promoting licensing standards, professional conduct, and requirements for continuing education.

- Objective 1.1: Complete comprehensive updates to the Board's continuing education program and regulations to provide clarity and accessibility, and to ensure continuing licensee competency and public protection.
- Objective 1.2: Establish a robust, effective Licensing Committee to identify issues and increase efficiency.
- Objective 1.3: Review reciprocity requirements to minimize barriers to licensure in California.

- Objective 1.4: Continue to monitor the Board's license fee structure to ensure the Board's financial stability, maintain access to the Board's services, and determine whether the Board needs to consider plans for restructuring its fees.

Goal Area 2: Enforcement - Ensure public protection and safety by establishing standards of practice for doctors of chiropractic, preventing violations of the Act, Board regulations, and professional standards, and taking effective action when violations occur.

- Objective 2.1: Implement updated disciplinary guidelines, Uniform Standards for Substance Abusing Licensees, and Consumer Protection Enforcement Initiative (CPEI) regulations, to provide consistency and clarity in disciplinary penalties, help educate licensees and the public, and deter violations.
- Objective 2.2: Streamline internal enforcement processes and standards, including complaint intake, investigations, and case management activities, to increase efficiency and ensure timely action.
- Objective 2.3: Improve the effectiveness of the Enforcement Program by implementing Expert Witness program enhancements, including recruitment, training, and ongoing assessment of diverse subject matter experts in specific areas of chiropractic practice.
- Objective 2.4: Develop and implement clearly defined standards for licensee recordkeeping by updating regulations to provide consistency, clarity, and accessibility to licensees, the public, and other stakeholders.

Goal Area 3: Public Relations and Outreach - Consistently engage, communicate, and collaborate with consumers, licensees, governmental entities, and stakeholders about the current and evolving practice of chiropractic and the regulation of the profession.

- Objective 3.1: Include more stakeholder ideas and perspectives in Board activities by continuing to foster relationships with legislators, other healing arts boards, professional organizations, and government agencies.
- Objective 3.2: Continue to increase the Board's presence and availability through diverse outreach opportunities where the Board can collaborate and engage with stakeholders to allow for sharing of feedback, input, and suggestions.
- Objective 3.3: Create diverse outreach plans to increase awareness about the profession and the Board's role to build relationships with stakeholders and diversify the profession.
- Objective 3.4: Build an interactive, language accessible social media presence to engage with stakeholders and assess stakeholder sentiment of the Board.
- Objective 3.5: Improve the Board's website by providing informative, language accessible content for applicants, licensees, the public, and other stakeholders and enhancing the functionality and user experience.

Goal Area 4: Laws and Regulations - Ensure that statutes and regulations strengthen and support the Board's mandate and mission of public protection and enable the Board to effectively regulate the chiropractic profession.

- Objective 4.1: Increase efficiency in rulemaking processes to move pending regulatory packages forward, prevent a backlog of packages, and improve staff and Board effectiveness.
- Objective 4.2: Perform a comprehensive review of existing regulations to identify and address any unnecessary or obsolete regulations and to clarify current regulations as needed.

Goal Area 5: Organizational Development - Maintain an effective organization through the professional development of staff, efficient utilization of resources, and exemplary public service.

- Objective 5.1: Update processes and procedures, key staff roles, and staff organizational structure to establish clear responsibilities and increase efficiency.
- Objective 5.2: Maintain a high-performance, engaged, and inclusive culture focused on effective training, individual development, and continuous improvement, to recruit and retain quality staff.
- Objective 5.3: Promote diverse, inclusive, and effective communication styles and opportunities to improve intraorganizational collaboration.
- Objective 5.4: Re-design the board member onboarding procedures and orientation processes, considering diverse learning styles, to create effective and engaged board members.

Control Environment

The Board has established a culture of integrity that is consistent with its mission to protect the health, welfare, and safety of the public. Oversight is provided by a seven-member board appointed by the Governor that consists of five doctors of chiropractic and two public members who set policy and strategic goals for the organization. Board members also serve on Licensing, Continuing Education, Enforcement, and Government and Public Affairs Committees where they directly oversee the operations and performance of those program areas.

The Board's organizational structure includes an executive officer, an assistant executive officer, two managers, and civil service staff who perform the Board's administrative, licensing, continuing education, and enforcement functions. Through an organizational chart, descriptions of staff functions, and detailed duty statements, the Board ensures that appropriate levels of responsibility, authority, control, and oversight are allocated to each staff function.

Internal control systems for the Board's key business functions are documented through procedure manuals, job aids, desk guides, and comprehensive process mapping. Board management is responsible for maintaining a competent workforce by continuously monitoring staff workload, productivity, and key performance indicators; evaluating staff performance and enforcing accountability; creating plans for staff's professional and personal development; and addressing issues through guidance, training, performance management, and the progressive discipline process.

Information and Communication

The Board is committed to collecting and sharing accurate, relevant, and timely information to support informed decision making and transparency. To ensure the reliability of its data, the Board works closely with representatives from the Department of Consumer Affairs (DCA) and subject matter experts. The data and statistics used for key performance indicators are collected directly from the Board's licensing and enforcement database.

The Board uses a variety of communication methods to gather and disseminate information internally. These forms of communication include in-person and virtual meetings, electronic communications, written correspondence, and telephone conversations. Management ensures that important information is shared across all levels of the organization through established reporting channels.

The Board has an established process for staff to report inefficiencies or concerns to management and leadership through one-on-one meetings with supervisors, regular staff meetings, and open-door policies. The Board also promotes awareness of and compliance with all state laws and policies regarding harassment prevention, whistleblower protections, and workplace health and safety.

Externally, the Board communicates with stakeholders through a wide range of channels, including subscription mailing lists, mass mailings, the Board's website, social media platforms, telephone, email, outreach events, conferences, and educational materials for consumers and licensees. To ensure clarity, professionalism, and alignment with state standards, all external communications are developed in accordance with DCA guidelines.

MONITORING

The information included here discusses the entity-wide, continuous process to ensure internal control systems are working as intended. The role of the executive monitoring sponsor includes facilitating and verifying that the Board of Chiropractic Examiners monitoring practices are

implemented and functioning. The responsibilities as the executive monitoring sponsor(s) have been given to: Tammi Pitto, Assistant Executive Officer.

The Board established a baseline to monitor its business functions through position duty statements, procedure manuals, and process mapping. To ensure the effectiveness of internal control systems and respond to vulnerabilities as they are identified, management continuously monitors employee work product, communicates deficiencies to staff, conducts detailed reviews and one-on-one meetings with staff, provides feedback and training, and uses statistical reports and stakeholder feedback to monitor compliance with established performance expectations.

RISK ASSESSMENT PROCESS

The following personnel were involved in the Board of Chiropractic Examiners risk assessment process: executive management, middle management, front line management, and staff.

The following methods were used to identify risks: brainstorming meetings, employee engagement surveys, ongoing monitoring activities, other/prior risk assessments, external stakeholders, consideration of potential fraud, and performance metrics.

The following criteria were used to rank risks: likelihood of occurrence, potential impact to mission/goals/objectives, timing of potential event, potential impact of remediation efforts, and tolerance level for the type of risk.

RISKS AND CONTROLS

Risk: Insufficient Revenue to Sustain Board Operations

The Board's annual budget is funded exclusively by the chiropractic profession through licensing and other regulatory fees. Although recent legislation amended the Board's fee structure and cost-saving measures have been implemented, the Board continues to face a structural imbalance in its fund due to operational costs that are outpacing revenue received from fees. Without an increase in revenue, the Board faces a significant risk of insolvency in fiscal year 2027-28.

Control: Ongoing Collaboration with the DCA Budget Office

The Board will continue to work closely with DCA's Budget Office to monitor the Board's revenue, plan for ongoing and future operational expenses, and repay the outstanding loan balance of approximately \$948,000 owed to the Bureau of Automotive Repair.

Control: Pursue an Updated Statutory Fee Schedule

The Board will pursue changes to its statutory fee schedule through the 2026 sunset review process with a goal of establishing appropriate fee-based funding that will restore fiscal stability, rebuild the Board's reserves, and allow the Board to repay the outstanding loan from the Bureau of Automotive Repair.

Control: Identify Opportunities to Leverage Technology and Modernize Operations

The Board will identify and evaluate opportunities to implement new technologies and workflows that enhance operational efficiency. By potentially leveraging automation for repetitive, labor-intensive tasks, the Board may be able to achieve cost savings and focus staff resources on higher-value strategic policy and program work.

Control: Pursue a Regulatory Fee Increase, If Necessary

The Board may need to increase its primary source of revenue, the annual doctor of chiropractic license renewal fee, through the regulatory process to ensure sufficient long-term funding for its core administrative, licensing, continuing education, and enforcement operations.

Risk: Artificial Intelligence (AI) Technology

The rapid advancement and widespread adoption of AI systems and technologies are transforming many sectors of the economy, particularly business, education, and healthcare. Within chiropractic and other healthcare fields, AI has the potential to significantly enhance clinical decision making, improve diagnostic accuracy, personalize treatment plans, predict patient outcomes, expand access to care, and handle routine administrative tasks. AI can also support professional learning through real-time, data-driven analytics, personalized content delivery, and immersive virtual environments.

However, the integration of AI into chiropractic also poses important regulatory issues for the Board to consider regarding accountability, transparency, patient consent, and consumer safety. AI systems may be used unethically or exploited to mislead consumers or circumvent traditional fraud detection mechanisms, or the technology may provide inaccurate or biased information. As AI becomes more prevalent in chiropractic practice, the Board must be prepared to investigate complaints involving its use and ensure that licensees continue to meet established professional standards of care.

Control: Staff Training on AI Applications

The Board will implement training for all staff on the ethical, legal, and practical use of AI in their positions and in chiropractic practice. This training will include potential benefits and risks and considerations specific to administrative, regulatory, and clinical contexts.

Control: Prepare Enforcement Staff for AI-Related Investigations

The Board will provide specialized training to its enforcement staff on how to investigate complaints involving AI. The Board will also collaborate with subject matter experts in AI and chiropractic practice to monitor trends, identify new risks, and inform enforcement strategies.

CONCLUSION

The Board of Chiropractic Examiners strives to reduce the risks inherent in our work and accepts the responsibility to continuously improve by addressing newly recognized risks and revising risk mitigation strategies as appropriate. I certify our internal control and monitoring systems are adequate to identify and address current and potential risks facing the organization.

Kristin Walker, Executive Officer

CC: California Legislature [Senate, Assembly]
California State Auditor
California State Library
California State Controller
Director of California Department of Finance
Secretary of California Government Operations Agency