

May 17, 2024

Norman Ouzts, DC
Chief Executive Officer
National Board of Chiropractic Examiners
901 54th Ave
Greeley, CO 80634

Dear Dr. Ouzts,

We are writing to express our concern regarding the recent announcement by the National Board of Chiropractic Examiners (NBCE) concerning changes to its exams and policies, particularly your assertion that *"these changes reinforce NBCE's commitment to high-quality assessments, but also directly address the key pieces of feedback we heard across all of our stakeholder groups."* This statement is simply not true. The NBCE has conveniently ignored input from a group of organizations representing thousands of stakeholders who are not supportive of a monopoly operating within chiropractic and financially benefiting from unnecessary exams.

Ignoring Key Stakeholder Feedback

As you are aware on October 24, 2023 several organizations submitted a request to the NBCE seeking essential data to evaluate the role and impact of NBCE exams in chiropractic education and practice. This request was in response to your call for stakeholder participation in the **"Advancement and Development Project."** However, it took the NBCE nearly three months to respond, and when you finally did, your response was evasive, providing no meaningful data. Instead, you directed the consortium down several rabbit holes, only to reveal that the requested data did not exist. We wrote back in response and still have not even received an acknowledgment of receipt. It appears the NBCE picks and chooses who its stakeholders are based on agreement with its policies.

Your recent announcement claims to have listened to stakeholders' concerns. Yet, the NBCE did not address or provide comprehensive outcomes data requested by the consortium, such as licensing exam success rates, performance trends over time, chiropractic college performance, and safety records. In each case, the NBCE either provided insufficient information, redirected the request to irrelevant sources, or completely ignored the inquiries.

Consolidating Control While Increasing Burden

Your decision to centralize Part IV exam testing in Greeley, Colorado, starting in 2026, consolidates the NBCE's control over the chiropractic profession, effectively positioning the NBCE as the final arbiter of chiropractic education quality. This move undermines the authority of accredited chiropractic schools, which have already certified students' competency through graduation. Moreover, the financial burden of traveling to Greeley imposes significant additional costs on students already facing substantial debt. The NBCE's offer of airport shuttle services and discounted hotel rates is dismissive of the genuine struggles faced by these students.

Lack of Data Supporting NBCE's Claims

The NBCE's sweeping claims about enhancing competency, public safety, and excellence in testing are unsubstantiated due to a lack of empirical evidence. The consortium's request for comprehensive data was met with inadequate responses, casting doubt on the transparency and accountability of the NBCE. Furthermore, the financial ties between the NBCE and its subsidiary, Ethics and Boundaries Assessment Services LLC (EBAS), as revealed in your 2022 financial report, indicate potential conflicts of interest that further question the financial sustainability and integrity of your operations.

Stakeholder Resolutions for Freedom in Chiropractic

It is imperative for the NBCE to consider the voices of all stakeholders including the chiropractic organizations, foundations, schools, and businesses that signed on to the Resolutions calling for a free and competitive marketplace in chiropractic education, licensing, and practice. These stakeholders demand transparency, accountability, and an end to monopolistic practices that treat students' debt as a funding source for unnecessary exams and other questionable activities.

It is becoming increasingly clear to many stakeholders that the only interest the NBCE serves is that of the NBCE and its Board of Directors.

- Foundation for Vertebral Subluxation
- Florida Chiropractic Society
- Chiropractic Society of Texas
- Georgia Council of Chiropractic
- Palmetto State Chiropractic Society
- New York Chiropractic Council
- Alliance of New Mexico Chiropractors
- International Federation of Chiropractors & Organizations
- International Agency for Chiropractic Evaluation
- Dynamic Essentials
- Sustainability Group
- Vida Chiropractic Worldwide
- TopChiro
- On Purpose
- Sherman College of Chiropractic
- Schubelvision
- ChiroFutures Malpractice Program
- McCoy Press
- Mile High Foundation
- Holder Research Institute