

January 23, 2025

Neil Harvison, PhD  
Chair - Committee on Recognition  
Council for Higher Education Accreditation (CHEA)  
One Dupont Circle NW, Suite 510  
Washington, DC 20036

**CHIROPRACTIC  
FREEDOM COALITION**

**Subject:** Third-Party Comments Regarding the Recognition of the Council on Chiropractic Education (CCE)

Dear Dr. Harvison,

The Chiropractic Freedom Coalition is a group of chiropractic organizations representing thousands of chiropractic stakeholders and we submit this letter to provide third-party comments regarding the **Council on Chiropractic Education (CCE)** and its compliance with CHEA's Standards and Procedures for Recognition. We raise several concerns about the CCE's operations, specifically its relationship with the **National Board of Chiropractic Examiners (NBCE)**, its pattern of exclusionary practices, and actions during its recent public meeting that undermine academic quality, transparency, accountability, and ethical standards.

## **Concerns Related to CHEA Standards**

### **1. Academic Quality and Student Achievement (Standard 1)**

- **1.B - Institutional Autonomy:** The CCE's reliance on NBCE exam scores as a proxy for licensure success undermines the autonomy of chiropractic institutions. By tying accreditation decisions to the outcomes of a single private testing organization with a monopoly, the CCE removes institutions' ability to define and assess academic quality independently.
- **1.D - Support for Innovation:** The NBCE's requirement for centralized Part IV exams, supported by the CCE, stifles innovation in clinical competency assessments. Institutions are fully capable of assessing clinical skills—as evidenced by similar practices in the medical (MD) and osteopathic (DO) professions, which no longer require equivalent external exams. This external requirement fails to account for institutional advancements in student evaluation.

### **2. Accountability and Transparency (Standard 2)**

- **2.B - Accurate and Accessible Data:** The CCE's reliance on NBCE scores rather than actual licensure rates as a benchmark for program success misrepresents institutional performance. Licensure rates, not standardized exam scores, should be the definitive measure of a program's effectiveness in preparing students for professional practice.

- **2.C - Responsiveness to Stakeholders:** The CCE has failed to respond to concerns raised by institutions and organizations regarding NBCE's move to a centralized Part IV exam requirement. Despite significant opposition from schools and the profession, the CCE has supported this policy without providing transparency or justification to stakeholders. The move to centralize the unnecessary Part IV testing by a private corporation with a monopoly creates an undue burden on students financially and emotionally, which may ultimately lead to fewer students enrolling in chiropractic colleges, further hindering an already difficult enrollment challenge faced by chiropractic colleges. Students already face huge student loan debt, and this move to centralize testing adversely affects student finances while reducing NBCE costs which are not shared with the students.
- **2.D - Fair Assessment of Institutional Performance:** By tying accreditation to NBCE metrics, the CCE risks penalizing institutions unfairly and potentially mislabeling them as underperforming based on metrics controlled by a private monopoly. The NBCE monopoly is able to be forced upon students and schools due to the CCE's own monopoly and incestuous relationships with the NBCE.

### **3. Accreditation Structure and Organization (Standard 3)**

- **3.B - Ethical Practices:** The close and intertwined relationship between the CCE and NBCE raises ethical and legal concerns. Both organizations are private entities that enjoy monopolistic control sanctioned by state statutes and regulations. This relationship compromises the independence and ethical operations of the CCE.
- **3.H - Independence:** The CCE's reliance on NBCE exams and policies calls into question its independence as an accreditor. The undue influence of NBCE practices, such as the centralized exam mandate, creates a potential conflict of interest.
- **3.M - Stakeholder Participation:** During NBCE's decision-making process for the centralized Part IV exam, stakeholder feedback from chiropractic schools and dozens of chiropractic organizations representing thousands of stakeholders was ignored. This lack of meaningful engagement and responsiveness fails to meet CHEA's standards for public and professional participation in accreditation activities.

#### **Additional Concerns: January 2025 Public Meeting**

On January 10, 2025, the CCE held its annual business meeting in Tempe, Arizona. This event, advertised as open to public observation and input, revealed further issues undermining the CCE's commitment to transparency and stakeholder engagement:

- **Censorship of the Press:** Despite no explicit prohibition on recording the open public comment session, the Chair of the CCE, Dr. Kristina L. Petrocco-Napuli, abruptly

stopped the recording of the meeting. This action directly contradicts the Council's stated commitment to transparency and openness.

- **Contradictions in Leadership Statements:** While CCE President Craig Little assured the press that they were welcome to attend and observe the meeting, the censorship actions and later comments emphasizing transparency appear contradictory and insincere.

### **Participation in Secretive Groups**

The CCE's participation in the secretive **Chiropractic Summit Group** further raises ethical and transparency concerns. This group operates under strict confidentiality, excludes many organizations from its discussions, and consolidates power among a select few entities, including the **NBCE and the Federation of Chiropractic Licensing Boards (FCLB)** which, like the CCE, are both private corporations benefiting from student loan money. Such exclusive practices violate principles of inclusivity and stakeholder engagement required by CHEA standards. The CCE's participation in this group, while excluding broader professional input, undermines its claim to represent the diverse interests of the chiropractic profession.

### **Borrower's Defense Claims Add Context to CCE's Practices**

The CCE's lack of transparency and ethical governance is further reflected in the growing number of Borrower's Defense claims from chiropractic students. Allegations include aggressive recruitment tactics, misrepresentation of career prospects, omission of critical financial information, and potential breaches of contract. These claims highlight the real-world consequences of a system that lacks accountability and reinforces the need for immediate reform.

### **Request for Action**

We urge CHEA to critically evaluate the CCE's compliance with its standards, specifically in the following areas:

1. **Reevaluate the appropriateness of NBCE exam scores as a proxy for licensure success in accreditation decisions.**
2. **Investigate the ethical and legal implications of the CCE's relationship with the NBCE and their monopolistic practices.**
3. **Ensure that stakeholder concerns and institutional autonomy are upheld in future accreditation decisions and policy developments.**
4. **Require the CCE to implement transparent and inclusive practices that align with CHEA's commitment to accountability and equity.**

We appreciate the opportunity to share these concerns and trust that CHEA will take the necessary steps to ensure the CCE's compliance with its standards. We remain available to provide additional information or clarification regarding these matters.

Thank you for your attention to these critical issues.

Sincerely,

- Foundation for Vertebral Subluxation
- International Federation of Chiropractors & Organizations
- Palmetto State Chiropractic Association
- Chiropractic Society of Texas
- Florida Chiropractic Society
- Alliance of New Mexico Chiropractors
- New York Chiropractic Council
- Georgia Council on Chiropractic
- Sustainability Committee
- MLS Seminars
- On Purpose
- Mile High Foundation
- Mile High Seminars
- Chiropractic Trust
- ChiroWay
- ChiroFutures Malpractice Program
- McCoy Press
- Waitlist Workshops
- Holder Research Institute
- Torque Release Technique
- Dynamic Essentials
- DE Lasting Purpose Foundation
- Pure Chiropractic Notes
- Titronics
- The Institute Chiropractic - TIC

For more information please visit: [chiropracticcartel.org](http://chiropracticcartel.org)