

March 11, 2025

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**CHIROPRACTIC  
FREEDOM COALITION**

**Subject: Response to CCE's February 5, 2025, Letter**

Dear Dr. Little,

We have reviewed your February 5, 2025, response to our concerns, and while we appreciate your engagement, your letter fails to adequately address the core issues we raised. Rather than providing meaningful explanations or solutions, your response relies on misdirection, omissions, and contradictions that further underscore the systemic issues within the CCE and its relationship with the National Board of Chiropractic Examiners (NBCE) and Federation of Chiropractic Licensing Boards (FCLB).

### **Lack of Transparency and Stakeholder Engagement**

Your response to our concerns about the lack of alternative meeting formats and the prohibition of virtual comments is dismissive. While you claim that “CCE has never received a request” for such accommodations, that is irrelevant to the larger issue: Why has CCE not proactively modernized its public engagement processes?

Furthermore, your assertion that written comments can be submitted at any time does not address the problem of exclusion during public meetings. A public comment session exists so that statements can be heard in real time, with the potential for response or discussion. The refusal to allow virtual comments undermines the very purpose of stakeholder engagement.

Additionally, your attempt to justify restricting public meetings by stating that “most accreditors do not allow meetings to be open to the public” is a deflection—the issue is not what other organizations do but whether the CCE is meeting its own stated commitments to transparency. Comparing CCE to the lowest standards of openness is not a justification—it’s an admission that improvements are needed.

Your letter also fails to address the press censorship that occurred at the January meeting. A representative of *The Chiropractic Chronicle* was prevented from recording, despite there being no stated prohibition in CCE’s policies. This directly contradicts your own statement in writing prior to the meeting that press and public observers were welcome. The optics of this decision—censoring the press while simultaneously declaring that CCE is committed to transparency—are deeply troubling.

### **The CCE's Relationship with the NBCE and Its Role in Licensing**

Your response to concerns over CCE's ties to the NBCE relies on misleading statements and omissions. While you claim that "CCE plays no role in setting examination requirements for jurisdictional licensing authorities," this ignores the reality that CCE's accreditation policies reinforce NBCE's monopoly by using its exam results as a primary measure of student achievement.

Furthermore, you attempt to argue that schools are not required to use NBCE scores because CCE allows them to submit proof of licensure as an alternative metric. This is a completely impractical and disingenuous suggestion for several reasons:

#### *Tracking Licensure Rates is Logistically Impossible*

There are 50 U.S. states and over 120 countries where chiropractic graduates may become licensed. Schools would be forced to obtain official licensure data from multiple licensing boards, many of which may not even provide such information. No system currently exists to collect and verify this data, meaning they would have to build one from scratch.

#### *If Licensure Rates Were a Viable Alternative, NBCE Part IV Would Be Unnecessary*

If proof of licensure were truly an acceptable alternative, one of the main justifications for NBCE Part IV would collapse. The real reason schools rely on NBCE data is because state licensing laws—shaped over decades by policies influenced by CCE and NBCE—require NBCE exams.

If CCE *genuinely* believed that this was a viable option to NBCE exam scores, it would partner with schools and the Association of Chiropractic Colleges (ACC) to develop a centralized licensure tracking system. Such a system could be funded by CCE and the schools and managed independently, removing the financial burden from students. Instead, CCE continues to default to NBCE data while pretending an alternative exists.

#### **The CCE's Participation in the Chiropractic Summit**

You did not address the concerns about CCE's participation in the Chiropractic Summit, a closed-door, secret group that excludes many professional organizations while granting privileged access to select entities, including the CCE, NBCE and the Federation of Chiropractic Licensing Boards (FCLB). Your silence on this issue raises further questions.

If CCE is truly committed to transparency and stakeholder inclusion, why does it engage in secretive decision-making forums while restricting public access to its own meetings and censoring them? CCE's participation in the Summit contradicts its claim of neutrality regarding licensure and examination issues. If CCE is simply an accreditor with no influence over licensing, why is it collaborating with the very organizations that dictate those policies?

#### **Failure to Address Broader Systemic Issues**

Your letter also ignores the larger crisis brewing within chiropractic education, highlighted by the surge in Borrower's Defense claims filed by chiropractic graduates. These claims allege that

schools misled students about career prospects, income potential, and the costs of education—many of the very issues CCE is supposed to regulate. Instead of acknowledging these systemic concerns, your response deflects and downplays legitimate criticisms. A true accreditor would engage with these issues, not dismiss them.

### **Conclusion: CCE's Evasion of Accountability is Not Sustainable**

Dr. Little, your response to our concerns does not reflect the transparency or accountability that an accrediting body should embody. Instead of offering solutions, you have provided misdirection, omissions, and impractical alternatives that do nothing to address the real issues. CCE cannot continue to claim independence while enforcing NBCE's monopoly. It cannot claim transparency while censoring public meetings and participating in secretive decision-making groups. And it cannot claim to protect students while ignoring, and adding to, the growing financial crisis facing chiropractic graduates.

The chiropractic profession deserves a true accreditor that prioritizes education, integrity, and fairness—not one that protects entrenched monopolies.

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