

June 26, 2025

Craig Little DC
Council on Chiropractic Education
Administrative Office
8049 North 85th Way
Scottsdale, AZ 85258



**Re: Statement and Request to Provide Oral Comment at
July 2025 Council Meeting Regarding NBCE Part IV
Centralization and CCE Policy 56**

Dear Dr. Little,

The Chiropractic Freedom Coalition (CFC) respectfully submits the following written comments for consideration at the Council on Chiropractic Education's (CCE) Semi-Annual Business Meeting on July 11, 2025 in Minneapolis, Minnesota.

We also formally request the opportunity to provide oral testimony during the public comment portion of the meeting and will register a designated representative as required.

Overview of Concerns

We are concerned about the ongoing and unaddressed implications of the National Board of Chiropractic Examiners' (NBCE) decision to centralize administration of the Part IV examination exclusively at its Greeley, Colorado headquarters. Beyond our assertion that the Part IV exam is wholly unnecessary to begin with, this unilateral structural change imposes substantial economic, geographic, and logistical burdens on students and disproportionately affects those from underserved regions.

Compounding this is CCE Policy 56, which effectively requires Doctor of Chiropractic Programs (DCPs) to report NBCE exam pass rates - primarily Part IV - as a proxy for graduate success. While CCE asserts that a licensure-based reporting alternative exists, the reality is that reliable, timely licensure data is not made publicly available by most state boards, rendering the exam data requirement de facto mandatory. As a result, Policy 56 embeds NBCE Part IV not only into licensure pathways, but also into institutional accreditation, effectively closing off any alternative routes for assessing clinical competency.

Regulatory Breakdown at the State Level

In addition to these concerns, the centralization of Part IV constitutes a material and substantive change from the format originally in place when most state statutes and regulations were adopted. However, there is no evidence that state chiropractic licensing boards have conducted the legally required due diligence to evaluate this change under their own administrative procedures. Specifically:

- There have been no public comment periods, board hearings, or stakeholder engagement efforts at the state level that we are aware of.
- There is no record of formal rulemaking or statutory revision to authorize or ratify the centralized model that we are aware of.
- State boards have not formally documented legal reviews or Attorney General opinions affirming compatibility with existing licensure laws that we are aware of.

In short, the centralized format is being enforced without the procedural safeguards and oversight required by law. This creates serious vulnerabilities for CCE, which continues to rely on NBCE Part IV outcomes as a basis for accreditation, even as the legitimacy of the exam's implementation framework deteriorates.

Legal and Accreditation Concerns

The centralization of NBCE Part IV and its continued use as a default accreditation metric under Policy 56 raises serious concerns regarding fairness, access, and compliance with both legal and federal recognition standards. Conditioning accreditation on a high-stakes exam offered exclusively by a single private entity at one location risks reinforcing monopolistic dynamics and may conflict with principles of due process, equal access, and nondiscrimination. Without formal state oversight or independent review, reliance on this model could place CCE's accreditation practices at odds with its obligations under U.S. Department of Education recognition criteria.

Request for Action

We urge the Council to:

1. **Immediately review and revise Policy 56** to provide genuine, functional alternatives to NBCE Part IV data for evaluating student outcomes.
2. **Publicly acknowledge the need for multiple, accessible, and lawful pathways** to assess clinical competency for both accreditation and licensure.
3. **Conduct an independent legal and policy assessment** of the implications of NBCE's Part IV centralization, including whether state boards have lawfully codified this shift.
4. **Implement public engagement procedures**, including opportunities for feedback from DCPs, students, regulators, and the broader profession on high-stakes issues affecting accreditation and licensure.

The Chiropractic Freedom Coalition looks forward to participating in this meeting and contributing to a productive discussion. We encourage the Council to act swiftly to protect the integrity of chiropractic education and the rights of students and institutions alike.

Sincerely,

Chiropractic Freedom Coalition