



**BOARD OF CHIROPRACTIC EXAMINERS
LICENSING COMMITTEE
MEETING MINUTES
January 9, 2025**

The Licensing Committee (Committee) of the Board of Chiropractic Examiners (Board) met via teleconference/Webex Events on January 9, 2025, in accordance with the provisions of Government Code section 11123.5. Board staff were present at the primary physical meeting location listed below and all Committee members participated virtually from remote locations.

Primary Physical Meeting Location

Department of Consumer Affairs

El Dorado Room

1625 N. Market Blvd., Suite N-220

Sacramento, CA 95834

Committee Members Present

Pamela Daniels, D.C., Chair

Janette N.V. Cruz

Staff Present

Kristin Walker, Executive Officer

Tammi Pitto, Assistant Executive Officer

Dixie Van Allen, Licensing & Administration Manager

Amanda Ah Po, Enforcement Analyst

Sabina Knight, Board Counsel, Attorney III, Department of Consumer Affairs (DCA)

Steven Vong, Regulatory Counsel, Attorney III, DCA

1. Call to Order

Dr. Daniels called the meeting to order at 3:11 p.m.

2. Public Comment for Items Not on the Agenda

Public Comment: None.

**3. Review and Possible Approval of August 25, 2023 and March 8, 2024
Committee Meeting Minutes**

This agenda item was tabled for a future meeting.

4. Update on Board's Licensing Program

Ms. Walker provided an update on the Board's Licensing Program and noted staff has been tracking the accrediting actions by the Council on Chiropractic Education (CCE), including the chiropractic programs at Keiser University College of Chiropractic Medicine and Life University that were placed on probation by CCE for noncompliance with CCE standards.

She shared that Governor Newsom will release his proposed 2025–26 budget on January 10, 2025, and February 21, 2025, is the last day for new bills to be introduced in the 2025–26 legislative session. She added DCA's Office of Professional Examination Services (OPES) is reviewing and validating the National Board of Chiropractic Examiners (NBCE) Parts I–IV and Physiotherapy examinations to coincide with NBCE's 2025 practice analysis, and OPES' report is expected to be released by fall 2025.

Ms. Walker explained the Board has continued to experience a steady decrease in its license population over the past decade, and staff is working with DCA's Office of Information Services to develop comprehensive statistical reports and analyze the Board's licensing and enforcement program metrics. She also summarized the pending regulatory proposals that relate to the Board's Licensing Program.

Dr. Daniels asked if staff had reviewed the recent occupational analysis (OA) that OPES released and if there were any specific highlights or changes. Ms. Walker responded affirmatively and commented that the description of practice and content areas identified in the OA align with the Board's proposed changes to the mandatory continuing education (CE) categories.

Dr. Daniels requested that staff begin tracking the license populations in other states, beginning with the largest, and comparing those trends to the Board's license population. She also asked about the percentage decline in the Board's license population. Ms. Walker indicated the Board is losing approximately 100 to 150 licensees per year.

Public Comment: Ron Oberstein, D.C. commented that over 58 percent of California doctors of chiropractic (DC) have been licensed for at least 20 years. He suggested further statistical analysis because the license population could deteriorate quickly through attrition.

Returned to Agenda Item 1. Roll Call / Establishment of a Quorum

Ms. Cruz joined the meeting at 3:34 p.m. and called the roll. All members were now present, and a quorum was established.

5. Review, Discussion, and Possible Recommendation Regarding Regulatory Proposal to Update the Requirements for Board Approval of Doctor of Chiropractic Degree Programs (amend and renumber, as necessary, California Code of Regulations [CCR], Title 16, sections 330, 331.1, 331.2, 331.5, 331.12.1, 331.12.2, 331.14, and 331.15 and repeal sections 331.3, 331.4, 331.6, 331.7, 331.8, 331.9, 331.10, 331.11, 331.13, and 331.16)

Ms. Walker presented a conceptual draft of proposed changes to the Board's regulations for chiropractic programs. She explained the intent of the proposal is to repeal the overly prescriptive regulations that are redundant to CCE accreditation standards, clarify the Board approval process, update the curriculum requirements, and establish new minimum requirements for preceptorship programs.

Dr. Daniels commented the draft concept is great, but she had a few concerns with the definitions of main campus, branch campus, and additional location because they may inadvertently restrict chiropractic programs from using or renting space in other facilities for clinical education. She also expressed her support for the preceptorship requirements, but reiterated the need to ensure the Board is providing enough flexibility for clinicals to be performed in different settings. She also suggested including NBCE pass rates in CCR, title 16, section 331.2, and additional work on the definition of a clinical encounter based on recent input and questions received from educators.

Ms. Cruz acknowledged the level of comprehensive edits made to the proposal based on prior Committee discussions.

Public Comment: Craig Little, D.C., EdD thanked the Committee for their work on this issue. He stated there are no quantitative hour requirements in the statute and he is concerned the hour requirements identified in the proposed regulations could hinder the profession in the future. He commented the CCE standards allow for competency-based education that is not linked to the total hour requirement, and suggested the Committee consider listing the percentages, not hour requirements.

Dr. Oberstein also thanked the Committee for their work on the proposal and encouraged the Committee to be as broadly specific as possible in the regulatory language to provide flexibility to chiropractic programs as education changes. He also requested that the proposed time limit for postgraduate preceptorships in the draft text be increased from six months to one year.

Ms. Walker explained the draft proposal provides a pathway for competency-based education, but federal requirements for competency-based education require institutions to demonstrate the equivalency in clock hours or credit hours.

6. Review, Discussion, and Possible Recommendation Regarding Regulatory Proposal to Clarify the Application and Examination Process for Doctor of Chiropractic Licensure, Including Temporary and Expedited Licensure and Fee Waiver for Military Spouses and Domestic Partners and Expedited Licensure for Veterans, Applicants Enrolled in U.S. Department of Defense SkillBridge Program, Refugees, Asylees, and Special Immigrant Visa Holders (amend CCR, Title 16, sections 320, 321, and 340–349)

Ms. Pitto introduced a conceptual draft of a regulatory proposal to clarify the application and examination requirements for obtaining a DC license, including temporary and expedited licensure, and to introduce a new prelicensure competency requirement that requires an applicant to have either passed the NBCE Part IV examination or been actively practicing in another state within the four years preceding the application.

Dr. Daniels noted the existing forms are being repealed and asked if staff is creating new forms. Ms. Walker responded affirmatively and explained the Board and other DCA programs have been placing the requirements for the forms in the regulation text, rather than incorporating the forms by reference, because it provides more clarity in the requirements and allows for minor, non-substantive changes to the forms, such as address or style changes, without having to make those revisions through the Office of Administrative Law.

Dr. Daniels noted the cost of the NBCE Part IV examination is \$1,585 and asked if NBCE offers payment programs to assist with the costs of the examination. Ms. Walker indicated she is unaware of any financial assistance available through NBCE, but noted the new prelicensure competency requirement would only affect a very small number of applicants.

Dr. Daniels referenced the requirement for applicants to disclose if they have ever held another professional license and asked how the Board uses that information.

Ms. Walker explained Business and Professions Code section 480 allows the Board to deny an application for a license if the applicant has been disciplined within the preceding seven years, so the purpose is to gather the applicant's professional license information to enable Board staff to verify the license status and prior discipline, if any, when reviewing the applicant's background.

Dr. Daniels suggested using the term "chiropractic program" rather than "chiropractic college" throughout the text for consistency and adding the term "provost" to the language referencing the chiropractic program dean or president. She also asked if the Board has any limit on the number of times an applicant can retake an examination after failure. Ms. Walker indicated there is no limit on the number of retakes for the California Chiropractic Law Examination (CCLE), but an applicant must wait 30 days between attempts and only has one year to pass the examination before their application is deemed abandoned and they must reapply and reestablish eligibility to take the examination.

Public Comment: None.

7. Review, Discussion, and Possible Recommendation Regarding Regulatory Proposal to Clarify the Process for Renewing Doctor of Chiropractic Licenses and Update the Requirements for Restoration of Doctor of Chiropractic Licenses in Forfeiture or Cancelled Status (amend CCR, Title 16, sections 370 and 371)

Ms. Ah Po presented the draft regulatory proposal to clarify the renewal process for DC licenses and update the requirements for the restoration of a forfeited or cancelled license. She explained the proposal would change the timeframe for cancellation of an expired license from three to four years after expiration and require a licensee to complete Board-approved CE to restore a license in forfeiture status. She added the proposal would also update the process for restoration of a cancelled license by requiring a licensee to complete 96 hours of Board-approved CE, demonstrate competency through either active practice in another state while the license was expired or by passing the NBCE SPEC examination within six months preceding their restoration application, and pass the CCLE. She shared the purpose of these additional requirements is to ensure licensees are competent and safe to resume active practice in California upon license restoration.

Dr. Daniels noted the NBCE SPEC examination is a written examination to test clinical knowledge and understanding, but unlike the Part IV examination, it does not address the practical competency and psychomotor skills to perform an examination and adjustment.

Ms. Cruz commented that the proposed changes provide clarity to staff when processing the different types of renewal and restoration applications. She also noted the change in disclosure of conviction information. Ms. Walker indicated the current requirement to disclose any violation of law is confusing to licensees, so it was narrowed to any felony and misdemeanor convictions within the reportable license renewal or restoration period. Ms. Cruz also suggested adding the term “electronic payment” to the accepted payment methods.

Motion: Dr. Daniels moved to recommend that the Board consider the regulatory proposal to amend CCR, title 16, sections 370 and 371, with an edit to section 371, subdivision (g)(3)(B) to replace the NBCE SPEC examination with the NBCE Part IV examination.

Second: Ms. Cruz seconded the motion.

Public Comment: None.

Vote: 2-0 (Dr. Daniels-AYE and Ms. Cruz-AYE).

Motion: Carried.

8. Review, Discussion, and Possible Recommendation Regarding Regulatory Proposal to Establish a Retired Status for Doctor of Chiropractic Licenses (add CCR, Title 16, section 328)

This agenda item was tabled for a future meeting.

9. Schedule 2025 Committee Meetings

The Committee scheduled a working group meeting on March 7, 2025, and public meetings via Webex on June 13, 2025, September 5, 2025, and December 5, 2025.

Public Comment: None.

10. Future Agenda Items

Dr. Daniels asked staff to prioritize the completion of the chiropractic curriculum regulations due to their impact on chiropractic programs and the profession. She also requested future discussions on the proposed telehealth regulation, reciprocity, and goals for the Board's next sunset review.

Public Comment: None.

11. Adjournment

Dr. Daniels adjourned the meeting at 5:00 p.m.