



4390 Bells Ferry Road
Kennesaw Georgia 30144

Phone: 404.247.2550
FAX: 678.445.1459
E-Mail: vertebralsubluxation@gmail.com
www.vertebralsubluxation.org

September 27, 2016

President

Christopher Kent, D.C., J.D.

Craig Little DC
Council on Chiropractic Education
8049 N. 85th Way
Scottsdale, AZ 85258-4321

Vice President

Matthew McCoy, D.C., MPH

Dear Dr. Little,

Board Member

Veronica Gutierrez, D.C.

The Foundation for Vertebral Subluxation is pleased to offer the Foundation's formal comments in response to your notice of draft revisions to the Council on Chiropractic Education's Accreditation Standards.

Board Member

Curtis Fedorchuk, D.C.

Primary Care

Much has already been made of this issue and the fact that many within chiropractic confuse primary care with portal of entry status and we are in agreement with the CCE that the term "primary care" in any of its derivations should be removed from the Standards. We are also supportive of the statement in the Forward:

Executive Director

Christie Kwon, MS, DC

"The CCE does not define or support any specific philosophy regarding the principles and practice of chiropractic, nor do the CCE Standards support or accommodate any specific philosophical or political position. The Standards do not establish the scope of chiropractic practice."

The problem is that in the very next paragraph the CCE does exactly that by stating:

*"Accreditation requirements focus on student learning outcomes that prepare DCP graduates to serve as competent, caring, patient-centered and ethical **primary health care professionals.**"*

Perhaps this was an oversight, but if it is not corrected and removed then it obviously negates the preceding paragraph and renders it a contradiction. If the CCE were sincere in its efforts to divorce itself from philosophical issues regarding the practice of chiropractic then it would simply replace "primary health care professionals" with "portal of entry providers".

Meta Competency 7 – Adjustment/Manipulation

We appreciate CCE's efforts to include a Meta-Competency regarding the Raison D'être of the chiropractic profession (the adjustment). However, the rationale for including "manipulation" using a "/" is flawed. The notion put forth by CCE that the forward slash can be interpreted as "and" and "or" and "and or" is proof positive that it should not be used in this context. It is frowned upon in legal writing because it is inherently ambiguous. If you mean 'and,' write and. If you mean 'or,' write or. This is a simple correction. If it is left as is then this is simply another indication that the CCE wishes to ignore facts to pursue an agenda.

Thank you for the opportunity to provide feedback on these latest revisions. We look forward to the correction of these obvious errors in the document.

Regards,

Matthew McCoy DC, MPH