## Congress of Chiropractic State Associations ...



... promoting a more unified profession

Mission: COCSA provides for the advancement of the chiropractic profession through service to member state associations.

Jan 23, 2012

Dear Dr. Little:

The Congress of Chiropractic State Associations (COCSA) represents State Associations on a national level. As part of our mission we have provided commentary and representation on behalf of our membership on a number of issues. It is the opinion of the Board of Directors that regulatory processes should never occur in a vacuum and it is our stance that open dialogue and transparency is necessary to create continuity, trust and acceptance within the profession. As such, it is also the opinion of the Board of Directors that our members, the State Associations, should have information to competently answer questions when posed by both members and non-members within their states.

Over the past two years the Chiropractic Educational Standards review process has drawn significant attention to the Council on Chiropractic Educations (CCE). This was the purpose of having CCE address our membership this past November during our annual business meeting. On December 14, 2011 after hearing comments from a significant number of stakeholders, some of whom were Chiropractic Summit members of which COCSA is a member, the NACIQI committee addressed several additional concerns. The NACIQI resolution to extend CCE's recognition for twelve months requested the following: "In addition to the numerous issues identified in the staff report, NACIQI asks the agency to demonstrate compliance with Section 602.13 dealing with wide acceptance of its standards, policies, procedures, and decisions, and to address how its standards advance quality in chiropractic education." Recent changes in regulations have resulted in a significant increase in the number of cited deficiencies for most accrediting agencies, and CCE was no exception.

It is our understanding that the Council devoted considerable time addressing the 41 concerns identified by the USDE staff and in fact has already voted and approved changes to by-laws and policies that will resolve many of those outstanding issues. The concern of the COCSA Board of Directors is in regard to some additional admonitions with regard to acceptance of CCE and how CCE standards advance the quality of chiropractic education, as referenced above. This is of particular interest to our membership as those added charges speak specifically to the concerns of many in the profession.

On behalf of the The Congress of Chiropractic State Associations and our membership, we wish to inquire of the Council on Chiropractic Education as to what specific steps the CCE intends to take to address the two significant issues added to the findings of noncompliance identified by the USDE staff at the conclusion of the December 14th hearing. Thank you for your attention to these concerns and requests. We look forward to your response within the next 30 days.

Sincerely,
Dr. Kate C. Rufolo-Dreher
President of Congress of Chiropractic State Associations

COCSA Board of Directors