

The International Academy of Clinical Neurology

1441 29th Street, #100
Des Moines, Iowa 50266

Phone USA (515) 727-4334
Fax USA (515) 727-4334
www.iacn.org

January 26, 2009

Mr. Brian Stieger, Executive Director
California State Board of Chiropractic Examiners
2525 Natomas Park Drive #260
Sacramento CA 95833-2931

Regarding: Proposed Regulatory Language for Recognizing Chiropractic Specialties

Dear Board Members,

It has come to the attention of the International Academy of Clinical Neurology (IACN) that language proposed to be adopted by the California Board of Chiropractic Examiners (CBCE), and posted following its recent meeting on January 8, 2009¹, may adversely and unfairly affect certain California licensed doctors of chiropractic as well as cause a safety concern to the citizenry of California.

The aforementioned draft eliminates recognition of diplomate status awarded to doctors of chiropractic recognized by the IACN. The original draft language, forwarded by the California Chiropractic Association (CCA), included direct recognition of the IACN. This inclusion was likely due to the vital role played by the IACN in maintaining excellence and balance in supporting Council on Chiropractic Education (CCE) Accredited Chiropractic Colleges in the process of chiropractic specialty education. ***Therefore, the IACN respectfully requests that the CBCE recognize the IACN diplomates.***

As a background, The IACN is an apolitical organization, established for quality in the chiropractic specialty of neurology. The IACN recognizes only those classes provided by CCE accredited chiropractic institutions, and the IACN allows only qualified chiropractic physicians to accrue hours toward specialty certification (no chiropractic students or non-chiropractors). While the IACN is deliberately NOT affiliated with chiropractic political trade organizations such as the American Chiropractic Association (ACA) and International Chiropractic Association (ICA), educational programs utilize guidelines which are consistent with resolutions published by the (ACA). Without CBCE recognition of the IACN, the result will be that ***graduates of CCE College sponsored Neurology Diplomate Programs are automatically ineligible to be recognized by the***

¹ California Board of Chiropractic Examiners; "Proposed Regulatory Language for Recognizing Chiropractic Specialties"; January 8, 2009 Page 57.

CBCE. These physicians will be stripped of their privilege of displaying their substantive achievement to their patients. Similarly, the citizenry of California would not be alerted to the diplomate status and therefore would be unable to avail themselves of these duly qualified doctors of chiropractic.

In addition to neurology, most chiropractic specialties, including rehabilitation and orthopedics, have multiple boards. It may also be important to note when crafting language that in general, diplomate recognition is moving away from trade organizations such as the ACA and ICA in favor of educational agencies such as the CCE. Masters degrees are also in place and on the horizon for chiropractic specialties.

Historically, the IACN is an outgrowth of the ACA's original neurology board known as the "American Chiropractic Academy of Neurology (ACAN)". This board was disbanded by the ACA in 1994 and replaced by the American Chiropractic Neurology Board (ACNB). Eventually, it was the former ACAN examining board members founded the IACN. The IACN is an interdisciplinary, non-profit educational organization founded in 1997 under 504A of the Iowa Code. It was specifically founded as a completely apolitical organization. It serves about 125 members in seven countries (primarily chiropractic neurologists in the US). The IACN examining boards require Council on Chiropractic Education (CCE) Accredited Chiropractic College Diplomate Program Sponsors, and do not allow non-chiropractors (including chiropractic students) to take diplomate programs for credit. The IACN is a leader in the use of sound test psychometry in all parts of the examination process. In its 10 year lifespan, the IACN has accomplished many firsts in chiropractic specialty education. The IACN board members were the first chiropractic neurology organization to employ the National Board of Chiropractic Examiners (NBCE) and Professional Evaluation Services (PES), to assist in test development. The IACN was also the first chiropractic neurology organization to join the National Organization for Competency Assurance (NOCA), develop subspecialty certification in electrodiagnosis, have multiple specialty boards examine together and have a national meeting for all chiropractic neurologists. The State of Florida specifically lists the IACN as a diplomate granting authority. The Iowa Board of Chiropractic Examiners lists the IACN as preferred for neurological training when performing electrodiagnosis.

While the intention of the proposed language may be to protect the California Citizenry, the IACN contends that the new language will have exactly the opposite effect. The IACN believes that removal of recognition represents an unfounded and prejudicial policy, which, under scrutiny, fails to either protect the citizenry of California or establish a reasonable quality standard for chiropractic neurologists. Additionally, it places an unfair burden and a financial hardship upon some of our most well credentialed and scholarly academicians, chiropractic neurologists and on the IACN, finally, it has a chilling effect on CCE Accredited Chiropractic College Diplomate Programs and other classes.

In summary the IACN is asking the CBCE to continue to recognize those doctors who have been awarded diplomates by the IACN for the following reasons:

1. All CCE College Neurology Diplomate Programs use the IACN testing boards and not the ACA “recognized” board.
2. IACN uses only valid psychometry in test preparation and post-test analysis.
3. All other states (to IACN knowledge) recognize IACN, including Florida and Iowa that reference IACN by name.
4. Graduates of CCE Accredited Chiropractic College Neurology Diplomate Programs are ineligible for recognition by the ACA “recognized board”.

In closing, please be mindful of the logic, measurement or standard your board is relying upon when it endorses defacto recognition of chiropractic specialties endorsed by the ACA or ICA. The IACN believes that its diplomates have clearly demonstrated superior academic qualifications and should certainly be included and recognized by the CBCE. The IACN urges the CBCE to return the original CCA draft language by including recognition of the IACN as a diplomate granting authority.

On behalf of the IACN please accept our most sincere thanks for addressing this matter. The IACN stands ready to assist the CBCE in any way and hopes that the CBCE will have the foresight to rectify the inequity of this situation.

Sincerely,

A handwritten signature in black ink that reads "Joseph S. Ferezy D.C." The signature is written in a cursive, flowing style.

Joseph S. Ferezy, DC
President, IACN