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**Georgia Council of Chiropractic's Testimony to the US Department of Education's
NACIQI committee Regarding the Council on Chiropractic Education
on December 14, 2011, Delivered by GCC President, Dr. Robert Braile**

The Georgia Council of Chiropractic appreciates the opportunity to provide input to NACIQI regarding CCE. We also praise the staff for their comprehensive report of the agency.

The public deserves accountability. Based on our experience with CCE's handling of GCC's formal complaint against the agency and one accredited program sent in December of last year, CCE's performance is non-acceptable. After a long period of silence and a complicated process, the CCE informed us last month of their final decision regarding GCC's complaint outcome... "no violations". Quite a contrast to the **41** areas of violations cited in the staff report, two of which were included in GCC's complaint.

The CCE process for handling complaints is unfair and designed to impede any attempt to address violations either by CCE-accredited programs or the agency itself. For example, GCC did not receive a response to its complaint until eight months later; CCE then requested GCC to send comments within 10 days!

CCE took 5 long years revising its standards under questionable processes and circumstances. The results led to further violations in the area of student services, recruiting, admissions, career placement and student complaints. GCC provided third party comments to require that at the time of acceptance, students must be advised of the total expected cost of chiropractic education, program graduation rate, and career

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placement information. Additionally, the CCE has not demonstrated significant efforts to engage students in the standards review process; a violation of criteria §602.21(b)(4).

CCE's standards fail to address the issue of graduates' preparation for federal Medicare compliance in the curriculum of its accredited programs, a violation of §602.21(a). The vertebral subluxation is central to chiropractic practice and clinical skills and mandatory for chiropractors to manage Medicare patients in all the 50 states. Has removed the important and federally required component from the standards.

The underlying cause of the problems with the CCE is the culture in which it has operated in protection of its ruling group and their agenda. Does CCE make readily available to the public the qualifications, and relevant employment and organizational affiliations of its members and principal staff... no! They guard this information like a secret so that no one recognizes that they mostly re-cycling the same people over and over again in different positions.

We would like NACIQI to recommend that CCE institute an open, transparent and democratic process of leadership succession, ensuring participation and involvement from other constituents. The days of "changing the rules to protect those who rule", need to come to an end. Only this way will the CCE represent balance in its judgment and execution of its basic duties.

In conclusion, given these concerns, the department staff is right to request the agency to come into compliance within 12 months. The GCC also requests that the CCE be directed to postpone the implementation of the new standards until the CCE and a new set of standards meet criteria. Additionally, directives should be given that speak to the self-governance of the CCE, to ensure that token service is not paid to the serious issues being brought to NACIQI today.

Again, GCC appreciates the opportunity to provide this input and looks forward to NACIQI and the secretary's commitment to ensure that CCE conforms to basic accreditation practices.

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