

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Sunset Commission Review of the Texas Board of Chiropractic Examiners
Date: Thursday, October 13, 2016 9:13:27 AM

From: Darin Mitchell
Sent: Thursday, October 13, 2016 8:48 AM
To: Sunset Advisory Commission
Subject: Re: Sunset Commission Review of the Texas Board of Chiropractic Examiners

I agree with the TBCE use an overly broad definition of “gross unprofessional conduct” is too much. Chiropractors are low-risk in general especially as compared to other types of medical doctors.

Chiropractic Facility Registration Is Unnecessary to Protect the Public. The board requires facilities providing chiropractic services to register with the board. However, registration of chiropractic facilities does not impose any regulatory requirements on the facility that enhance public safety or relate to the practice of chiropractic. The vast majority of violations cited in facility complaints do not pose harm to the public because they are administrative in nature, such as failure to change address or failure to timely renew expired facility registration. Because the risk to a recipient of chiropractic services stems from the actual chiropractor, and not the facility, board efforts aimed at regulation of facilities are misplaced and unnecessary. Key Recommendation • Discontinue registration of chiropractic facilities... I agree... this does nothing for chiropractic or public safety. We get called out nationally for “administrative errors” as if we had mal-practice or “gross unprofessional conduct”. Again Medical doctors do not have this. Get rid of it!

I would like to see a national acceptable scope among all states as we are tested on them nationally.