



# MEMORANDUM

<b>DATE</b>	June 12, 2026
<b>TO</b>	California Veterinary Medical Board (Board)
<b>FROM</b>	Jessica Sieferman Executive Officer (EO)
<b>SUBJECT</b>	<b>Agenda Item 3. Update, Discussion, and Possible Action on Assembly Bill (AB) <a href="#">2775</a> (Committee on Business and Professions, 2026) Chiropractic Act</b>

## INTRODUCTION

AB 2775 is the sunset bill for the Board of Chiropractic Examiners (BCE) and is expected to be heard in the Senate Business, Professions, and Economic Development Committee (Committee) on June 29, 2026.

On June 2, 2026, Committee staff informed the Board’s EO that the attached language is proposed to be included as amendments to AB 2775 “to authorize licensed chiropractors who are not veterinarians to provide services to animal clients, beyond the pathways that exist today.” (Attachment 1). As of June 12, 2026, AB 2775 has not been amended to include the new language.

Committee staff explained that “this language reflects the framework that should be replicated for other licensed health professionals who are not veterinarians but wish to provide services to animal clients. The language includes appropriate oversight by the individual’s licensing board and animal client safety provisions. This language does not reflect Senator Wahab’s or Assemblymember Berman’s position.”

Due to the inability of the Board to weigh in on the proposed amendments to AB 2775 prior to the Board’s regularly scheduled July meeting, the Board will discuss the proposed amendments during their off-calendar meeting on June 15, 2026.

## OTHER STATE CONSIDERATIONS

In January 2025, the Board received a presentation regarding allied health certifications issued by the Kentucky Board of Veterinary Examiners (KBVE) and the Nevada Veterinary Board (NVB). The presentations walked through how their states are regulating other allied health practitioners practicing on animals. The meeting materials can be reviewed [here](#) and the presentations can be seen [here](#).

## BOARD STAFF RECOMMENDATIONS

Board staff reviewed the proposed amendments to AB 2775 and identified the following implementation concerns:

- Unclear Registration Requirements

It appears the intent of the proposed amendments is to require the authorized animal practitioner to obtain a registration with the Board prior to practicing on animals. The proposed amendments would authorize an “animal healthcare practitioner” to provide authorized animal healthcare services as long as, among other things, the individual registers with the Board. (Prop. Business and Professions Code (BPC), § 48XX, subd. (c)(2).)

The registration would expire two years after the date of registration and may be renewed in a manner approved by the Board. (Prop. BPC, § 48XX, subd. (g)(1).) The proposed amendments would establish continuing education (CE) requirements and authority for the Board to discipline authorized animal healthcare practitioners. (Prop. BPC, § 48XX, subds. (h), (k).)

However, as currently structured, there is no authority for the Board to review, approve, deny, or issue a registration to the authorized animal practitioner. As such, there is nothing for the Board to discipline and no ability to investigate complaints.

Suggested Amendment:

Proposed BPC section 48XX, subdivision (c), should be restructured to mirror the statutory framework of BPC sections [4846](#) and [4841.5](#).

- No Submission of Proof of Satisfying Requirements Prior to Practicing

Under the proposed amendments, the requirements for a licensed chiropractor to practice on animals would be established in proposed BPC section 1060, subdivision (b). However, as written, there would be no requirement that the licensed chiropractor submit to BCE proof of satisfying those requirements prior to practicing on animals. The chiropractor would be required to register with the Board prior to practicing on animals, but only one out of the seven requirements under new BPC section 1060, subdivision (b) (proof of the certificate) would be required to be provided to the Board. (Prop. BPC, § 48XX, subd. (c)(2).)

Suggested Amendment:

Board registration requirements specified under proposed BPC section 48XX, subdivision (c)(2), should include submission to the Board of proof of satisfying the requirements specified under proposed BPC section 1060. All proof should be submitted to the Board from the primary source (e.g., certification sent to the Board directly from the certifying entity).

- No Specified Training

The proposed amendments would authorize chiropractors who meet the specified requirements to provide “animal chiropractic only to those animals on which the chiropractor has received training.” (Prop. BPC, § 1060, subd. (b)(7)(D).) However, there are no parameters on the training itself (e.g., approved providers, course content, length, etc.). This would allow any individual to provide a brief overview of how to provide animal chiropractic on an animal species and call it “training” to meet the requirement.

Suggested Amendment:

The Board may want to consider requesting the training be specific to the training requirements referenced in proposed BPC section 1060, subdivision (b)(1), (3), or (7)(A).

- “In Good Standing”

The proposed amendments would require chiropractors and veterinarians to hold their respective licenses “in good standing.” (Prop. BPC, §§ 1060, subd. (b)(1), 48XX (c)(3), (4)(A).)

While “in good standing” is common nomenclature throughout licensing boards in and outside of California, it is widely inconsistently implemented. Factors such as a delinquent license, pending investigations, educational letters, warning letters, citations, probation, and revocation/surrender may all impact whether a licensing board considers a license “in good standing.”

Through its last two sunset bills, the California State Legislature, at the Board’s request, removed “in good standing” from license requirements due to the subjectivity and vastly different interpretations throughout the United States and Canadian provinces.

Suggested Amendment:

The Board may want to consider requesting removing “in good standing” and instead make it clear the application is subject to denial pursuant to section 4883 (if the registration requirements are restructured as recommended).

- Consumer Confusion

Proposed BPC section 48XX, subdivision (d)(1)(A), would require a consumer notice stating “the animal healthcare practitioner is not licensed by the Veterinary Medical Board, but the board may accept and review complaints.” While the Board would not “license” the practitioner, the proposed amendments appear to task with the Board with registering the practitioner and investigating any complaints.

Consumers do not know the difference between licenses and registrations. If a consumer read the proposed notice, they may not know the benefit of filing a complaint with a Board that does not license them.

Similarly, proposed BPC section 48XX, subdivision (d)(1)(D), requires the notice to include the “telephone number and internet website of the primary licensing board where the license may be checked and complaints may be made.” However, it does not inform consumers how to check the Board registrations and state where complaints may be made.

#### Suggested Amendments

The Board may want to consider requesting replacing “is not licensed by the Veterinary Medical Board” with “is registered with the California Veterinary Medical Board.”

In addition, the Board may want to consider requesting the consumer notice require the same information for both the BCE licensees and Board registrants.

- Insufficient Fees

The only fees referenced in the proposed amendments are for a registration fee “not to exceed \$100 or the actual cost of registering an animal healthcare practitioner, whichever is lower.” There is no renewal fee established in the proposed amendments.

In general, it is necessary for licensing/registration fees (including application, initial registration and renewal fees) to cover all administrative/enforcement costs related to that license/registration. If the new registrants are only required to pay the cost of initial registration, the Board would have insufficient funds to support all other administrative and enforcement functions contemplated by the proposed amendments in new BPC section 48XX, subdivision (l).

#### Suggested Amendment

The Board may want to consider requesting the fee that would only cover the cost of registering be replaced with a registration application and renewal fee.

- Minor Technical Amendments

The following amendments are minor in nature, but should be requested:

- Add “California” to all instances of “Veterinary Medical Board.”
- Add “veterinary” in front of “premises” in BPC section 1060, subdivision (b)(3).
- Replace “animal chiropractic practitioner with “authorized animal practitioner” in BPC section 1060, subdivision (b)(6).
- Replace “4846.5” in BPC section 1060, subdivision (b)(7)(B) with “4858.1”

- Conform instances of “animal healthcare practitioner” in proposed BPC sections 4825.1, subdivisions (j)(1)(D), and 48XX, subdivisions (c), (e), (f), (h), (i), (j)(2), (k), and (l), to the defined term “authorized animal practitioner” in subdivision (i) of proposed BPC section 4825.1.

## **BOARD REGULATIONS**

To properly implement the proposed amendments, the Board would need to promulgate regulations in the following areas:

- Practice Agreement

The Board would need to clarify the following terms in regulation:

- “Adequate coordination and communication between the licensed veterinarian and authorized animal practitioner. (Prop. BPC, § 4825.1, subd. (j)(1).)
- “Appropriate communication and safety protocols or procedures...” (Prop. BPC, § 4825.1, subd. (j)(1)(A).)
- “Protocol(s) for referring an animal patient to a licensed veterinarian in the event of an adverse reaction...” (Prop. BPC, § 4825.1, subd. (j)(1)(D).)

- Registration Requirements

The Board would need to create a registration form and determine if any additional registration requirements are necessary. (Prop. BPC, § 48XX, subd. (c)(2).)

- Board-Recognized Certification Program

Proposed BPC section 1060, subdivision (b)(2)(C), would provide for certification programs recognized by the Board. There are currently no certification programs recognized by the Board, and the proposed amendments would require the Board to establish regulations specifying what certification programs should be recognized for licensed chiropractor practice on animal patients.

- CE Requirements

The Board, by July 1, 2028, would need to promulgate regulations for CE and registration renewal requirements for an authorized animal practitioner to clarify the registration renewal process established under proposed BPC section 48XX, subdivisions (g)(1) and (h).

## **POLICY CONCERNS**

In addition to discussing the implementation concerns, the Board may want to have the following policy discussions:

- Removal of Direct Veterinarian Supervision Requirement

Historically, the Board has been opposed to removing the requirement that other healing arts professionals, such as chiropractors and physical therapists licensed

to practice on humans, have direct veterinarian supervision when practicing on animals. This proposal would allow chiropractors (and any subsequent human healing arts professional) to practice on animals with no direct supervision if specified requirements are met.

Policy Question

If the implementation concerns listed above are addressed, will California consumers and their animals be protected if this proposal were to take effect?

- Unlicensed Practice No Longer a Misdemeanor

Currently, if chiropractors practice on animals without direct veterinarian supervision, it would be considered unlicensed practice and constitute a misdemeanor.

Proposed BPC section 1060 would set parameters on how chiropractors can practice on animals without direct veterinarian supervision. If a chiropractor practices on animals without complying with the requirements pursuant to that section, it would be considered unlicensed practice.

However, under the proposed amendments, that unlicensed practice would no longer be considered a misdemeanor. (Prop. BPC, § 1060, subd. (c)(2).)

Policy Question

Is removing the misdemeanor classification in the best interest of California consumers?

- Experience Hours

The proposed amendments would require a chiropractor to have provided a minimum of 125 hours of animal chiropractic under the direct supervision of a licensed veterinarian, or the chiropractor has practiced musculoskeletal manipulation for one year to be authorized to provide animal chiropractic services. (Prop. BPC, § 1060, subd. (b)(3).)

Policy Question

Is the number of experience hours/time sufficient experience?

**STAKEHOLDER FEEDBACK**

The California Veterinary Medical Association submitted comments to Committee staff and the Board's EO for Board consideration during its June 15, 2026 meeting (Attachment 2).

**ACTION REQUESTED**

The Board is asked to consider the attached language and consider taking a position on the proposed amendments to AB 2775.

**ATTACHMENTS**

1. Senate Business, Professions and Economic Development Committee Staff  
Proposed Language
2. Comments from California Veterinary Medical Association, dated June 4, 2026

Language Draft

***Chiropractic Act Changes:***

**Section 1060 is added to the Business and Professions Code to read -**

**1060**

(a) For Purposes of this section “animal chiropractic” means the evaluation and treatment of an animal’s vertebral or extremity joint dysfunction through spinal, joint, or musculoskeletal manipulative therapy or soft tissue therapy.

(b) A licensed chiropractor who has held an active chiropractor license in this state for at least one year may provide animal chiropractic services, as an authorized animal practitioner as defined in Section 4825.1, consistent with the scope of chiropractic practice, to an animal patient according to all the following:

(1) The chiropractor holds an active license in good standing issued by the board.

(2) The chiropractor holds a current and valid certificate from either one of the following:

(A) The American Veterinary Chiropractic Association

(B) The International Veterinary Chiropractic Association

(C) A certification program recognized by the Veterinary Medical Board.

(3) The chiropractor has provided a minimum of 125 hours of animal chiropractic under the direct supervision of a licensed veterinarian, or the chiropractor has practiced Musculoskeletal manipulation (MSM) pursuant to Section 2038 of Title 16 of the California Code of Regulations at a premises registered with the Veterinary Medical Board pursuant to Section 4853 for one year. Experience gained prior to January 1, 2027, shall count toward the experience requirement.

(4) The chiropractor registers with the Veterinary Medical Board pursuant to 48XX.

(5) If the chiropractor is not under the direct supervision of a licensed veterinarian, the chiropractor provides animal chiropractic pursuant to a practice agreement as described in Section 48XX.

(6) The animal chiropractic practitioner notifies the board of their practice of animal chiropractic on a form prescribed by the board.

(7) (A) The chiropractor completes eight hours of continuing education every two years in the practice of animal chiropractic.

(B) Continuing education may be obtained from any approval agency recognized by the board pursuant to Section 363 of Title 16 of the California Code of Regulations, so long as the continuing education is in animal chiropractic or is earned by attending courses sponsored or cosponsored by any entity listed under paragraph (1) of subdivision (b) of Section 4846.5.

(C) The Board may determine if the 8 hours can be counted toward the requirements specified in Section 363 of Title 16 of the California Code of Regulations.

(D) The chiropractor provides animal chiropractic only to those animals on which the chiropractor has received training.

(c) (1) In addition to other acts constituting unprofessional conduct within the meaning of this chapter, failure to comply with the requirements of this section or Section 48XX or any regulation adopted pursuant those sections shall constitute unprofessional conduct and is grounds for disciplinary action.

(2) A violation of this section shall not constitute a misdemeanor under Section TBD.

(d) A report of a final disciplinary action against a licensee of this chapter by the Veterinary Medical Board under Section 48XX shall be deemed as conclusive evidence of unprofessional conduct by the licensee under Section 317, Title 16, of the California Code of Regulations.

(e) The board shall immediately notify the Veterinary Medical Board of any disciplinary actions or practice restrictions placed on the license of a chiropractor, providing animal chiropractic who has notified the board of their practice of animal chiropractic.

(f) A chiropractor whose license is suspended, revoked, or otherwise disciplined by the Board shall not provide animal chiropractic.

(g) This section does not authorize an unlicensed person to practice animal chiropractic.

(h) This section does not prohibit a licensee of this chapter from providing Musculoskeletal manipulation (MSM) pursuant to Section 2038 of Title 16 of the California Code of Regulations.

**Veterinary Medicine Changes:**

**Add New Definitions to Practice Act - SEC. 4825.1 is amended to read:**

(h) “Authorized animal healthcare services” means services rendered to an animal patient by a healthcare professional licensed by the state, pursuant to authority granted in this section or otherwise authorized by the board.

(i) “Authorized animal practitioner” means an individual licensed by the state to provide healthcare services to human patients, and who meets the following criteria: ‘

(1) The individual registers with the board

(2) The individual has obtained certification from a program that provides training in authorized animal healthcare services as required by Section 1060.

(3) The individual only performs authorized animal healthcare services pursuant to the scope of their professional license and certification.

(j) “Practice agreement” means a written agreement between a licensed veterinarian and an authorized animal practitioner that includes both of the following:

(1) Policies and procedures to ensure adequate coordination and communication between the licensed veterinarian and the authorized animal practitioner, including, but not limited to, all the following:

(A) Appropriate communication and safety protocols or procedures specific to providing authorized animal healthcare services consistent with standards of good veterinary practice.

(B) The location or premise where services are to be provided, including any range or remote setting.

(C) The availability of consultations between the veterinarian and the authorized animal practitioner providing authorized animal healthcare services.

(D) Protocol(s) for referring an animal patient to a licensed veterinarian in the event of an adverse reaction to the treatment provided by the animal healthcare practitioner.

(2) An agreement that the authorized animal practitioner will only practice services authorized by law and will not practice any other type of veterinary medicine.

**New Section - Authorized Animal Healthcare Practitioners - SEC. 48XX is added to the Business and Professions Code:**

(a) For purposes of this section, the following services are considered “authorized animal healthcare services”:

(1) “Animal chiropractic” as defined in Section 1060

(b) The following individuals are considered an “authorized animal practitioner” for purposes of this section:

(1) Chiropractors who meet the requirements set forth under Section 1060

(c) An authorized animal healthcare practitioner may provide authorized animal healthcare services so long as the following conditions are met:

(1) the authorized animal healthcare practitioner meets the requirements in Section 1060.

(2) The animal healthcare practitioner registers with the Board, on a form prescribed by the Board that includes, at a minimum includes the following:

(A)The license number.

(B) Proof of certification as specified in Section 1060.

(C) The premise address where services are to be provided, including any range or remote setting.

(3) The authorized animal healthcare practitioner holds an active practice agreement with a veterinarian licensed in this state in good standing.

(4)(A) A valid veterinary client-patient relationship has been established between the owner of the animal patient and a licensed veterinarian who is in good standing in the state for the condition being treated

(B) The veterinary client-patient relationship need not be established by the same veterinarian with whom the authorized animal healthcare practitioner holds an active practice agreement

(5) The authorized animal practitioner provides a notification to the owner of the animal patient in writing that includes their license number, and a statement notifying the owner of the animal patient that the authorized animal practitioner is not licensed by the Veterinary Medical Board and is only authorized to provide animal chiropractic and is not a licensed veterinarian.

(d) If authorized animal healthcare services are rendered at a location that is not a premises registered with the board pursuant to Section 4853, the following conditions shall apply:

(1) A notification shall be posted in a conspicuous location accessible to public view that notes all the following:

(A) A statement that the practitioner is not licensed by the Veterinary Medical Board, but the board may accept and review complaints.

(B) The practitioner's license number and the name of the practitioner's primary licensing board.

(C) The telephone number and internet website of the primary licensing board where the license may be checked and complaints may be made.

(D) The telephone number and internet website of the Veterinary Medical Board.

(2) If animals are housed or retained for treatment, compartments for animals which are maintained in a comfortable and sanitary manner shall be provided.

(3) Where animals are kept at the location for 24 hours or more, the animals shall be provided with an opportunity for proper exercise. Compliance with this section may be achieved by the use of exercise runs or by providing the animal with the opportunity for outdoor walks. Where a location has exercise runs, they shall be clean and sanitary and provide for effective separation of animals and their waste products.

(4) Authorized animal healthcare services shall not be rendered at any location where healthcare services are provided to human patients.

(5) The board may establish additional requirements for locations where authorized animal healthcare services are rendered through regulation.

(e) The authorized animal practitioner is solely liable for all treatment provided to an animal patient as an animal healthcare practitioner.

(f) The Board may charge a fee for registration not to exceed \$100 or the actual cost of registering an animal healthcare practitioner, whichever is lower.

(g)(1) A registration shall expire two years after the date of registration and may be renewed in a manner approved by the board and consistent with Article 5 (commencing with Section 4900).

(h) The board, no later than July 1, 2028, shall establish by regulation, the requirements, including verification of any continuing education specified in Section 1060, the renewal process for an animal healthcare practitioner registration.

(i) An authorized animal healthcare practitioner whose professional license is suspended, revoked, or otherwise disciplined by their licensing authority shall cease providing authorized animal healthcare services.

(j)(1) This section does not authorize an unlicensed person to practice authorized animal healthcare services.

(2) This section does not authorize an authorized animal healthcare practitioner to provide any other services or perform any other acts that constitute veterinary medicine.

(k) Consistent with this chapter, the board may discipline an authorized animal healthcare practitioner, including, but not limited to, revocation of their registration to perform authorized animal healthcare services.

(l) The board shall report final disciplinary actions against an authorized animal healthcare practitioner to the respective licensing agency.

(m) An individual authorized to perform animal healthcare services pursuant to this section shall not use the term “veterinary” in their professional title, including but not limited to “veterinary chiropractor” unless they are licensed to practice veterinary medicine by the board.

**SEC. 48XX.**

No reimbursement is required by this act pursuant to Section 6 of Article XIII B of the California Constitution because the only costs that may be incurred by a local agency or school district will be incurred because this act creates a new crime or infraction, eliminates a crime or infraction, or changes the penalty for a crime or infraction, within the meaning of Section 17556 of the Government Code, or changes the definition of a crime within the meaning of Section 6 of Article XIII B of the California Constitution.

Authorized Animal Practitioner- Chiropractic Draft Language  
 California Veterinary Medical Association (CVMA) Comments  
 6/4/2026

Objective Comments

- The “Veterinary Medical Board” is now officially called the “California Veterinary Medical Board”
- The “Veterinary Client-Patient Relationship” is actually the “Veterinarian-Client-Patient Relationship”

Section	Comment
1060(a)	It is not going to be easy to have two conflicting definitions of animal chiropractic in law. Please consider aligning your definition with the established definition that has been on the books for 30 years in <a href="#">CCR 16, Section 2038(a)</a> .
1060(b)(3)	<ul style="list-style-type: none"> <li>• This subsection offers two options: either 125 hours of chiropractic under direct veterinarian supervision, or working pursuant to section 2038 for a year. But, they are redundant because section 2038 also requires direct supervision.</li> <li>• Since “working for a year” does not specify full-time work, CVMA would recommend going with a finite hour requirement. 125 hours is very low, so please reconsider the required direct supervision hour-minimum.</li> <li>• Also, the word “provided” should be “practiced.”</li> </ul>
1060(b)(7)	Eight hours is an insufficient amount of CE for a two-year period. This should be doubled to require 16 hours at a minimum.
1060(b)(7)(B)	“approval agency” should be “education provider”
1060(b)(7)(D)	<p>This section says that an animal chiropractor can only work on animals on which they have received training, but that means that they can take a one-hour online self-study course and claim that they have training.</p> <p>This statement should be amended to state that they can only work on patients for which they have received training as a component of their accredited certification curriculum;</p>
1060(d)	This section implies that the California Veterinary Medical Board has some authority and jurisdiction to impose disciplinary action against a chiropractor- but officially all a chiropractor has to do is “register” with the CVMB.

	<p>The rest of the “dual oversight” language suggests that the disciplinary authority resides with the BCE (Board of Chiropractic Examiners.) This section speaks contrary to the 48xx section which states clearly that the CVMB has oversight.</p> <p>This section should be amended to match 48xx.</p>
<p>1060(e)</p>	<p>This section needs to be reworded to: 1) fix the grammar error with the placement of the comma, and, 2) to change the statement “who has notified the board of their practice of animal chiropractic” to “if the board is aware that the chiropractor performs animal chiropractic services.”</p>
<p>1060(h)</p>	<p>The regs are not going to be able to continue to exist- consider striking this subsection.</p>
<p>4825.1(h) and (i)</p>	<p>This section is setting up a pathway for ANY human health care provider to expand their scope of practice to include animals and the CVMA is strongly opposed to this language. This language is a non-starter for the CVMA and must come out. If a version of this language is going to be included in the Sunset Review vehicle for the Chiropractic Board, then this language should pertain to chiropractors working on animals only.</p> <p>This sets a bad precedent in that it invites any human healthcare profession to expand their practice scope to include animals. This will systematically dismantle veterinary medicine- why bother to become a veterinarian if all you have to do is take a certification course and you can practice on animals?</p> <p><b>CVMA strong request:</b> Remove this entire section and then take the practice agreement language from it and add it to the 48XX (chiropractor-specific) section.</p> <p>Second option: Please write in reciprocity for veterinarians in order to make this an even playing field for all health care providers.</p> <p>Please note, (i)(2) is essentially stating that any human health care provider must conform with 1060, which specifically requires animal chiropractic certification.</p>
<p>4825.1(j)</p>	<p>This practice agreement is good- but there will be issues since later in the draft language, 48XX(c)(4)(B) states: “The veterinary client-patient relationship need not be established by the same veterinarian with whom the authorized animal healthcare practitioner holds an active practice agreement” (Continued.on.next.page• ij)</p>

	<p>The practice agreement language implies that the veterinarian signing the practice agreement with the chiropractor is the SAME veterinarian who has established the Veterinarian-Client-Patient Relationship for the patient receiving chiropractic care.</p> <p>If (c)(4)(B) remains in the language, it allows for a chiropractor to potentially never communicate with the patient’s veterinarian.</p> <p>Option 1: Remove 48xx(c)(4)(B) so that the practice agreement must be between the patient’s veterinarian and the chiropractor; or,          Option 2: If 48xx(c)(4)(B) is going to remain, then affirmatively state <u>that the veterinarian who holds an active practice agreement with the chiropractor shares legal liability in the chiropractor working on animal patients.</u></p>
48XX(c)(2)	Need to include “Proof of required continuing education, if applicable.”
48xx(c)(4)(B)	Please consider striking this. It messes up the formalized relationship and duties on the part of the patient’s veterinarian and the chiropractor to communicate.
48xx(d) And 48xx (d) (6?)	<p>This seems to be a loophole, allowing a chiropractor to bypass the requirement to register with the board. The CVMA opposes its inclusion in the bill. The majority of chiropractors will use this loophole and will decide to invoke (d) to avoid VMB registration altogether.</p> <p>Who is the intended target/beneficiary of this language? For example, if this is intended to pertain to a “range setting,” then the requirement such as posting a notice will not be feasible. The language pertaining to animals “housed or retained for treatment” seems to suggest that the bill anticipates an expansion far beyond chiropractic, such as to local animal shelters, animal rescues, or to a human surgeon working on animals. (An animal would never be kept by a chiropractor overnight, for example.)</p> <p>Finally, as it pertains to (d), please add a statement as a new (6) that the animal chiropractic practitioner shall not take radiographs or render other diagnostic images of the animal patient.</p>
48xx(f)	<p>The fee is going to need to be much higher. The veterinary profession is NOT interested in subsidizing scope creep and would very actively protest the low fee if this legislation comes to pass.</p> <p>.(Continued.next.page• i)</p>

	<p>With the current proposed fee, the veterinary profession will have to pay higher registration and premise fees for chiropractors to do this work because the CVMB will not be able to manage these registrants for a fee of \$100 annually.</p>
<p>48xx(h)</p>	<p>Regulations are not necessary for this. The statute spells out the qualified CE providers. The rest doesn't really need regs.</p>
<p>48xx(k)</p>	<p>This affirmatively states that the CVMB has disciplinary authority over a chiropractor and that the BCE does not. We are fully in support of that, but be aware that it is going to cost more than \$100 per chiropractor registration to do that.</p> <p>As previously stated, this statement conflicts with 1060(d).</p>
<p>48xx(m)</p>	<p>This title protection needs to be expanded beyond the specific word "veterinary" to include "any variation thereof" and include a general statement to include the use of any terms which would induce the belief that the chiropractor is a veterinarian.</p>