

March 15, 2012

To: Texas Board of Chiropractic Examiners  
333 Guadalupe Street  
Tower III  
Suite 825  
Austin, TX 78701

RECEIVED  
Sarah Matthews  
MAR 16 2012  
TEXAS BOARD OF  
CHIROPRACTIC EXAMINERS

Re: Opposition to Rule §71.15 pertaining to "Recognized Specialties"

Please find included over 2000 signatures gathered in opposition to your proposed rule to recognize chiropractors as specialists in acupuncture, as well as letter from John Paul Liang – president of the American College of Acupuncture and Oriental Medicine, and the Texas Association of Acupuncture and Oriental Medicine.

These signatures represent the concern, and even outrage, of licensed acupuncturists, educators, students, patients from all walks of life (including patients of chiropractic), and the Chinese community.

Acupuncture is *not* traditionally part of chiropractic, and the grave concern amongst those of us who are actually trained extensively in Chinese medicine (which acupuncture *is* traditionally a part of) is how acupuncture is being represented by an ignorant, undertrained chiropractic profession.

Let me give you but one example, this from a local chiropractor's web site:

"Are chiropractic spinal adjusting treatments necessary with acupuncture?  
- *Absolutely. Spinal adjustments are part of the acupuncture health care...  
Leaving the chiropractic adjustment out of the treatment plan invites failure.*"

This is a patently false statement.

This same chiropractor also "primarily uses needle-less electrical stimulation" but represents this as acupuncture. It is not.

While this chiropractor's misrepresentation of acupuncture is troubling, more troubling still is the Chiropractic Board condoning the representation as a "specialist" someone who has met only a bare minimum training requirement (a requirement considered substandard by virtually anyone knowledgeable of acupuncture). To represent oneself as a specialist with such meager training is profoundly misleading to the public. This proposed rule also notably sets a wildly divergent standard from the level of training and continuing education required for other areas of specialization recognized by the Chiropractic Board. One would assume a specialist would actually be required to specialize, not merely meet a token requirement.

This proposed rule is contrary to your mission and purpose. I urge you to consider your mission as a regulating body and act accordingly.



Wally Doggett, L.Ac.  
Austin, Texas