



WASHINGTON STATE  
CHIROPRACTIC QUALITY ASSURANCE COMMISSION  
BUSINESS MEETING MINUTES  
November 13, 2025 – 9:00 a.m.

This was a public meeting that was held both in person and online.

**Commission Members:**

Vanessa Wise, DC, Chair; William Davis, DC, Vice-Chair; Jas Walia, DC, Vice-Chair; Dana Clum, DC, Immediate Past Chair; Brian Chan, DC; Stephen Chan, DC; Michael Clifton, DC; Michael Long, DC; Susan Jensen, JD, Public Member; Mario Roybal, DC; and Judge Julie Spector (ret.) Members absent: Susan Bogni, MPA, Executive Committee Public Member; and Benjamin Zepeda, DC. Absent: Judge Julie Spector(ret.), Public Member

**Staff Members:**

Bob Nicoloff, Executive Director  
Betty Moe, Deputy Executive Director  
Ericka Brown, Director of Operations and Policy  
Jenny Yeam, Projects and Compliance Manager  
Christopher Gerard, Assistant Attorney General

**OPEN SESSION – Thursday, November 13, 2025**

**9:01 a.m.**

**1. CALL TO ORDER – Dr. Wise, Chair**

**1.1** The November 13, 2025 agenda was approved as amended, removing item 10.

**2. MESSAGES FROM COMMISSION LEADERSHIP - Dr. Wise, Chair; Dr. Davis, Vice-Chair; Dr. Walia, Vice-Chair; Susan Bogni, MPA, Executive Committee Public Member; Dr. Clum, Immediate Past Chair**

**2.1** Commission leadership had the opportunity to provide comments.

Dr. Wise welcomed everyone to the meeting virtually. She thanked staff for their hard work organizing the meeting and for their continued efforts in navigating HELMS. Dr. Wise also expressed appreciation to the Commission members and special guests for taking the time to attend.

Dr. Davis welcomed participants and thanked them for their engagement. He noted that it is a busy time for the Commission, but a positive and productive one, and expressed gratitude to everyone involved.

Dr. Walia reflected on the past year, noting significant progress. Sharing that many of the Commission's goals were accomplished, and commending both staff and Commission members for their outstanding contributions. Dr. Walia stated that the year has been quite successful and expressed optimism for the coming year.

Ms. Bogni echoed her colleagues' sentiments and shared that she is looking forward to a lively meeting.

Dr. Clum also expressed gratitude, appreciating being part of a profession that allows her to serve the community in a meaningful way. She thanked colleagues working in the field for their dedication to serving communities. She recognized fellow Commission members and staff for their tireless efforts that go above and beyond to achieve shared goals.

**3. DISCUSSION REGARDING THE NATIONAL BOARD OF CHIROPRACTIC EXAMINERS PART IV EXAMINATION – Dr. Wise**

- 3.1** The Commission discussed a request to eliminate the passage of the Part IV examination as a requirement for a chiropractor license in the State of Washington.

Dr. Lanzara-Bazzani, representing the Chiropractic Freedom Coalition, requested that the Commission reconsider the requirement of Part IV of the National Board of Chiropractic Examiners (NBCE) exam for licensure in Washington State. She stated that clinical competencies assessed in Part IV are already addressed through accredited chiropractic programs and earlier NBCE exams. She noted that the cost, travel, and potential retakes create a financial burden for graduates, and removing Part IV could maintain public protection while reducing unnecessary barriers.

Dr. Grant Dennis, Board Chairman of the International Federation of Chiropractors and Organizations, supported removing Part IV, emphasizing that Washington could establish state-specific competency standards, reduce costs for graduates, and set a precedent for other states. He highlighted that public protection and competency remain primary considerations.

Dr. Outz of NBCE provided details on the Part IV exam, including costs, travel logistics, and the new exam model, which allows candidates to take the exam up to 48 weeks per year. Dr. Outz noted that the current Part IV format is costly and unsustainable, requiring extensive staffing for limited testing dates. Centralizing the exam helps stabilize costs, currently \$1,585. NBCE has prepared a video regarding the changes.

Commission members questioned whether removing Part IV could affect reciprocity with other states. Bob Nicoloff noted that the Commission’s policy on substantial equivalency would need review if other states began removing Part IV requirements.

Dr. Wise thanked all guests for their participation and encouraged the Commission members to review the shared NBCE video. The Commission will continue to consider the information as it develops rules related to licensure requirements.

**4. APPROVAL OF MEETING MINUTES – Dr. Wise**

- 4.1** The September 11, 2025, Commission business meeting minutes were approved as presented. Susan Bogni, MPA, abstained as she was not in attendance.

**5. PUBLIC COMMENT**

- 5.1** Members of the public had an opportunity to address the Commission.

**6. DATA SHARING AGREEMENT WITH THE OFFICE OF THE INSURANCE COMMISSIONER (OIC) – Rayne Pearson, DOH Executive Director of Legal Services**

- 6.1** On September 11, 2025, the Commission reviewed and approved a memorandum of agreement regarding the sharing of disciplinary information with the Office of the Insurance Commissioner (OIC). A second data-sharing agreement will be considered for approval by

the Commission.

Rayne Pearson, Executive Director for the Department of Health, explained that pursuant to Senate Bill 5579, if the OIC has cause to believe that a health care provider or health care facility has violated Section 2 of the bill (codified at RCW 48.43.732), the OIC may submit relevant information to the disciplining authorities. Information exchanged may include complaints against facilities and providers related to communications sent to consumers regarding contract negotiations with insurance carriers.

Upon receipt of such information, the disciplining authorities will assess the allegations to determine whether they may constitute potential violations. Following completion of the review, the disciplining authority will notify the OIC of the outcome, including whether the violation was substantiated and any enforcement action taken because of a substantiated finding.

A motion was made to approve the data sharing agreement with OIC. The motion carried.

## **7. COMMISSION MEETING PLANNING – Dr. Wise**

**7.1** The following Commission business meeting days and locations for 2026 were determined.

- January 8, 2026- remote
- March 12, 2026- in person
- May 14, 2026 - remote
- July 9, 2026- in person
- September 10, 2026 – remote
- November 12, 2026 – in person

All meetings will be held at the Department of Health in Tumwater, and virtual access will also be provided.

## **8. 2025 AND 2026 NATIONAL AND STATE ACTIVITIES AND MEETINGS – Dr. Wise**

**8.1** The Commission discussed the following activities and meetings:

- FCLB District I & IV meeting, September 25<sup>th</sup>– 28<sup>th</sup>, Omaha, Nebraska
  - Members attended:
    - Dr. Davis
    - Dr. Wise has received an FCLB scholarship

Dr. Davis reported that during breakout sessions at the FCLB meeting, participants focused on seven discussion questions. One question addressed how boards handle anonymous complaints. In his breakout group, Washington was the only state that reported addressing anonymous complaints.

Mr. Nicoloff stated that if the information received does not require patient records, it may be possible to investigate an anonymous complaint. He cautioned against automatically closing such complaints and emphasized that if potential misconduct or unprofessional conduct can be reviewed without patient records, it should be considered, noting the Commission’s responsibility to protect the public.

Christopher Gerard, AAG, cautioned against adopting a blanket policy of not investigating anonymous complaints. He echoed Bob Nicoloff’s points, noting that many anonymous complaints can be thoroughly investigated and that the complainant's identity is irrelevant to the investigative process.

He acknowledged, however, that some allegations, though serious, may not be adequately investigated due to evidentiary limitations.

Dr. Wise reported on a presentation by Dr. Craig Little regarding concerns raised by the Council on Chiropractic Education (CCE) following the passage of legislation requiring educational institutions to demonstrate graduate outcomes, particularly given the rise in student loan debt. Dr. Wise indicated that chiropractic programs are exploring more competitive educational models and cost-reduction strategies, including expanded use of asynchronous learning.

Dr. Wise also reported that during breakout discussions, chiropractors from multiple states expressed concerns that some graduates may be entering practice without sufficient knowledge or practical skills related to chiropractic adjustment techniques.

- NBCE Part IV Examination, November 8<sup>th</sup>– 9<sup>th</sup>, Various Locations. Including Portland
  - Members participated:
    - Dr. S. Chan
    - Dr. Davis

Dr. S. Chan reported observing a reduction in the number of individuals sitting for examinations, noting that where six examination sessions were previously conducted, only four were held, indicating a decrease in examination participation.

Dr. Wise shared information about the upcoming conference.

- Federation of Chiropractic Licensing Boards (FCLB) annual conference and the National Board of Chiropractic Examiners (NBCE) delegate meeting – April 29-May 3rd, 2026, Atlanta, GA
- Council on Licensure Enforcement and Regulation (CLEAR) 2026 Annual Educational Conference, September 14<sup>th</sup> -17<sup>th</sup>, 2026, Portland, OR
- FCLB District Meeting -Districts I & IV – September 4<sup>th</sup> - September 6<sup>th</sup>, Anchorage, AK

## **9. COMMISSION MEMBERS PARTICIPATING IN PROPOSED LEGISLATION REVIEWS – Betty Moe, Deputy Executive Director**

- 9.1** The Commission identified members who will serve as representatives for the review and analysis of proposed legislation during the 2026 session.

A motion was made to have Dr. Wise and Susan Bogni, MPA, serve as representatives for the 2026 session. The motion carried.

## **10. REQUEST TO BACKDATE A LICENSE RENEWAL – Betty Moe, Deputy Executive Director, and Bob Nicoloff, Executive Director**

- 10.1** This item was removed from the agenda as part of the agenda’s approval.

## **11. RULES COMMITTEE REPORT AND RULES WORKSHOPS - Betty Moe, Deputy Executive Director, and Committee Members – Susan Bogni, MPA; Dr. Clum; Judy Colenso, ProTem Public Member, Dr. S. Chan, and Dr. Wise**

- 11.1 Rules Workshop** - The Commission is considering revisions to [WAC 246-808-010](#), [246-808-105](#) through [246-808-140](#), [246-808-180](#), [246-808-181](#), [246-808-190](#), [246-808-510](#), [246-808-535](#), and [246-808-801](#) through [246-808-830](#) to clarify, streamline, and modernize the rule language, and to be

consistent with current laws and practice standards.

The Commission focused its review on 246-808-535. A motion was made to send the rules package to the rules committee for additional changes based on commission member comments. The package will be brought back to the full Commission for final approval.

- 11.2 Rules Workshop** – The Chiropractic Quality Assurance Commission is considering amending WAC 246-808-505, Classification of chiropractic procedures and instrumentation, to better align the rule language with the statutory language and to modernize and streamline current language. The Commission may also consider further amendments based on research and input from interested parties.

A motion was made to file a CR-102 and schedule a hearing regarding the approved language. The motion carried.

A motion was made to refer the instrumentation and procedures list to the Instrumentation and Procedures List Committee for review. The motion carried.

**12. BUDGET COMMITTEE REPORT & BUDGET UPDATES - Betty Moe, Deputy Executive Director, and Committee Members – Dr. Long, Dr. Clum, Dr. Davis, Dr. Roybal, and Judge Julie Spector, Public Member**

- 12.1** A budget report was not presented. Ms. Moe reported an estimated FY 25 starting fund balance of -\$272,869, noting the figure may change as prior fiscal year spending sheets are finalized and outstanding revenue and costs are entered. The Commission had previously anticipated a biennium-end fund balance of -\$213,179. The last budget update was provided at the May 8 Commission meeting.

Commission members requested additional information regarding the division's indirect costs and expressed concern about ensuring the Commission is not being double-billed. Staff will request a meeting with the budget office to seek clarification and report back to the Commission. Members emphasized the need for finalized budget information before discussing further strategies. The Commission also discussed the possibility of rescheduling the Budget Committee meeting currently set for November 18th and agreed to continue efforts to obtain more precise and more complete financial data, including inviting appropriate representatives to a future meeting.

**13. ANIMAL CHIROPRACTIC PROJECT UPDATE - Dr. Matthew Waldron, Pro-Tem Member, Project Chair; Susan Jensen, JD, Project Vice-Chair; Dr. Wise, Commission Chair; and Bob Nicoloff, Executive Director**

- 13.1** Dr. Waldron provided an overview of animal chiropractic education and the regulatory framework being considered in Washington State. He noted that while Washington is making progress in this area, more than 30 states already address animal chiropractic education.

In the United States, animal chiropractic education is offered by approximately six schools. The exact number varies because some programs operate only when there is sufficient demand. Educational requirements across these programs are standardized. The commonly accepted minimum is 210 hours of training, typically divided between didactic/online coursework and in-person instruction. Hands-on laboratory sessions generally take place over five-day periods in barns, fields, pastures, ranch land, or similar environments, with locations including Missouri and Dallas.

The draft being presented involves granting endorsement to chiropractic licenses. The draft includes standards for issuance and renewal.

Dr. Waldron anticipates an active legislative session. The Washington State Chiropractic Association has prepared draft regulatory language, and discussions are ongoing with lobbyists representing both the chiropractic and veterinary associations to clarify potential concerns.

Ms. Jensen thanked Dr. Waldron and provided an update on legislative preparations, noting that discussions with lobbyists continue to ensure concerns are addressed before legislative hearings.

**14. REQUEST TO DEVELOP A COMMISSION POLICY REGARDING GONAD SHIELDING – Betty Moe, Deputy Executive Director**

- 14.1** The Commission discussed a request from Susan L. Vlasuk, DC, DACBR, to adopt the following policy statement:

*“According to WAC 246-225-020(2), gonad shielding shall be used in cases where the gonads are in the field of view except when that shielding may interfere with the diagnostic procedure. The Commission, however, does support and agree with more recent guidelines that gonad shielding should not be used in conjunction with an AEC system (Automatic Exposure Control).”*

A motion was made to refer the request to the Office of Radiation Protection for follow-up as they see necessary. The motion carried.

**15. COMMISSION DRAFT STRATEGIC PLAN UPDATE – Bob Nicoloff, Executive Director**

- 15.1** Proposed plans to accomplish several components of the strategic plan were presented for discussion.

A motion was made to approve the presented projects: Commission Newsletter Readership Improvement Plan, Website FAQ Improvement Plan, and Updating the Joint Operating Agreement. The motion carried.

**16. COMMISSION NEWSLETTER AND TRAINING PLANNING – Bob Nicoloff, Executive Director**

- 16.1** The Commission discussed the list of future newsletter articles and training topics.

Bob Nicoloff reported that the newsletter needs to be revamped. He shared that several articles have already been drafted, though some planned contributions are no longer feasible due to timing or member availability. He will work with the Executive Committee to brainstorm ideas, seek additional input from members between meetings, and refine the draft newsletter. Bob Nicoloff also noted that ideas for future training will be developed for discussion at the next meeting, and additional feedback on the draft newsletter will be incorporated.

**17. REQUESTS FOR A LIST OF LICENSEES – Bob Nicoloff, Executive Director**

- 17.1** The Commission will consider any request for a list of licensees that have been received.

There were none received.

**18. STAFF REPORT AND PLANS – Bob Nicoloff, Executive Director**

**18.1** Current projects and activities in the Commission office were discussed.

A motion was made and approved to notify all credential holders by mail that renewal notices will no longer be mailed and will instead be delivered electronically via email.

**19. DRAFT COMMISSION PLAN TO ADDRESS EXECUTIVE ORDER 25-03 – Betty Moe, Deputy Executive Director, and Bob Nicoloff, Executive Director**

**19.1** Governor Ferguson issued Executive Order 25-03 - *Improving Transparency and Building Efficiency in the State’s Permitting and Licensing Processes* on January 15, 2025. The Executive Order includes three key directives for all state agencies: cataloging requirements, setting processing deadlines, and a plan for refunds for missed deadlines.

The Commission reviewed a draft document to address the requirements of the Executive Order.

A motion was made to approve the Commission’s Improvement Plan document to address the requirements of Executive Order 25-03. The motion carried.

**20. PUBLIC COMMENT**

**20.1** Members of the public will have a second opportunity to address the Commission.

**21. NEW BUSINESS REQUESTS – Commission Members**

**21.1** Commission members requested the following agenda items for future meetings:

- The current disciplinary costs are roughly 40% of the Commission budget. A request was made to look at how this can be reduced. This will be brought to the Executive Committee for discussion, then sent to the Budget Committee.
- NBCE Part IV examination follow-up.

**22. ADJOURNMENT**

**22.1** The meeting adjourned at 1:55 p.m.



January 8, 2026

Prepared By: Robert Nicoloff, Executive Director

Date



January 8, 2026

Approved By: Vanessa Wise, DC, Chair

Date