



State of Ohio  
**Ohio State Chiropractic Board**

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November 30, 2022  
Senate Workforce & Higher Education Committee  
Senator Terry Johnson, Chair

Chairman Johnson, Vice Chair Cirino, Ranking Member Martin, and members of the Committee. My name is Elizabeth Moore. I am the Executive Director of the State Chiropractic Board which licenses and regulates the practice of chiropractic and animal chiropractic, as well as the practice of acupuncture by chiropractors. It is an honor to speak to you today about Substitute House Bill 509 and the impacts it will have on the Board.

The most significant impact of this legislation would reduce the Board's biennial revenue by over \$525,000 by decreasing the Board's primary source of revenue from licensing and renewal fees. Additionally, legislation previously enacted in 2020 requires the Board to deposit \$25 of every license renewal into the Chiropractic Loan Repayment program, reducing the Board's revenue by another \$62,000 per biennium. Combined, the proposed fee reductions and loan repayment deposits would catastrophically reduce the Board's biennial budget by nearly half. This would require at least a 50% reduction in staffing and have a significant detrimental effect on our investigative resources.

The Board feels very strongly about budget containment and has consistently shown to be good stewards of its revenue. It is important to consider that the Board has not raised its licensure or renewal fees since 1997. This has been accomplished by careful budgeting and cost containment measures to maintain our fee structure, such as staff and office space reductions, converting to biennial license renewal, reducing the number and length of Board meetings, and converting to an online Jurisprudence examination saving the Board and its applicants time and money. Ohio has long been respected and recognized as a leader in chiropractic regulation by our peers, our federation and our national examining board, all of which is based upon the Board's ability to fund its operations.

National chiropractic license application fees average \$274.22 and renewal fees average \$400.54. (see Pennsylvania Department of State's Occupational Licensing 50 State Comparison at <https://www.dos.pa.gov/ProfessionalLicensing/Pages/50-State-Comparison-Report.aspx>) Ohio's fees are near the national average (\$250 and \$500 respectively).

Comparing Ohio's fee structure with contiguous states requires a deeper dive. Many states' revenue is increased by charging for services that Ohio does not. To name a few, Kentucky, Indiana and West Virginia require licensees to pay a reduced license renewal fee for inactive or retired licenses. Kentucky charges specialty application fees and West Virginia collects revenue to register continuing education and to renew corporations and LLCs.

For these reasons, the Board respectfully requests that its fee structure remain unchanged so that we may continue to provide our excellent level of service to the citizens of Ohio.

Additionally, Substitute House Bill 509 repeals the Board's current process for issuing and renewing acupuncture certificates, and most concerning, removes regulation of acupuncture. The bill removes educational standards and simply requires a chiropractor to file evidence of "national certification from the national board of chiropractic examiners" with the Board. The National Board of Chiropractic Examiners (NBCE) is strictly a testing organization and does not issue, nor have the authority to issue, certifications or require continuing education to maintain competency.

Moreover, removing the term acupuncture from our statute and disciplinary codes removes the Board's authority to regulate and discipline this separate and distinct profession. Acupuncture is a profession that requires licensure, continuing education, renewal and most importantly, regulation.

The Board respectfully requests that its authority to issue, renew and regulate acupuncture certificates remain intact and simply reduce the number of educational hours required for a certificate from 300 to 200 hours. Reducing the hours will make the Board's requirements consistent with other states and ensure standard qualifications.

Thank you again for the opportunity to testify. I welcome any questions from the committee.