

FLORIDA BOARD OF GOVERNORS

January 27, 2005

SUBJECT: Implementation Authorization for a Doctor of Chiropractic at FSU

PROPOSED BOARD ACTION

Consider implementation authorization for a Doctor of Chiropractic (CIP 51.0101) at Florida State University.

AUTHORITY FOR BOARD OF GOVERNORS ACTION

Article IX, Section 7 (d), Constitution of the State of Florida

BACKGROUND INFORMATION

FSU has designed a program that integrates five existing master's degree programs (Nutrition, Movement Science, Aging Studies, Public Health, and Health Policy) into chiropractic education to infuse a research component into the overall curriculum. At five years in length, the total number of credit hours is 175 for the Doctor of Chiropractic plus an average of 36 credit hours for the master's degree, making the academic program longer than traditional chiropractic programs. Admission requirements are proposed to be higher than the average at existing U.S. chiropractic colleges, and students must also meet the admission requirements for their selected master's degree.

No faculty are in place to implement the program, but the proposal provides a detailed timeline for the recruitment of 106 faculty timed to coincide with anticipated enrollments. The proposal indicates that existing space is inadequate and new facilities will be necessary. These facilities include the new Classroom Building partially funded in 2004-2005 and the planned Life Science Building. Budget projections are heavily dependent on continued funding through legislative appropriations at \$9 million annually and student tuition at \$5.5 million annually.

The proposal argues for a moderate increase in chiropractic physicians in Florida and the potential for a greater demand nationwide; and that the proposed program has the potential for improving chiropractic education and practice in the United States, especially with regard to research into the efficacy of chiropractic care. The University's proposal was reviewed by Dr. Rand Swenson, DC, MD, PhD, Associate Professor of Anatomy and Medicine at Dartmouth Medical School; and by Dr. David J. Wickes, BS, DC and Executive Vice President and Provost at Western States Chiropractic College, Portland Oregon.

Members of the Board of Governors have received a number of documents with respect to this request, including the actual FSU proposal, the reports of the two consultants who reviewed the proposal, and a December 2004 informational paper on chiropractic and chiropractic education. Key issues pertaining to those documents as well as to a February 2000 legislatively mandated feasibility study for an FSU school of chiropractic are compared in a matrix in the pages preceding the staff analysis.

Supporting Documentation Included:

Comparison Matrix
Staff Analysis

**Supporting Documentation
Previously Provided:**

FSU Proposal
Consultants' Reports
"Chiropractic and Chiropractic
Education" (12/04, Division of Colleges
and Universities)

Facilitators / Presenters:

Chancellor Austin / R. E. LeMon
FSU Representatives

COMPARISON MATRIX OF CHIROPRACTIC-RELATED DOCUMENTS

	KEY ISSUES		
Document Name	Appropriateness to University Mission	Need and Demand	Cost/ Facilities/ Readiness
FSU Chiropractic Proposal	Research-intensive nature of the program, and collaboration with existing master's programs, will fit with FSU's mission	<p>Argument is presented for a modest increase in production.</p> <p>U.S. Bureau of Labor Statistics predicts a significant increase in need.</p> <p>Florida Agency for Workforce (AWI) Innovation predicts a moderate increase in need (108 per year), but if utilization increases from 7.5% to 10% of population, 500 new practitioners needed.</p> <p>Presents argument of Florida's growing population.</p> <p>Program estimates to graduate 380 by year five as compared to estimated need at 108.</p>	Outlines a wide array of needs including facilities, equipment, and large number of faculty.
DCU Staff Analysis	Not identified in any past or present SUS strategic planning documents; consistency with BOG targeted areas and with FSU mission is debatable.	<p>Florida Agency for Workforce Innovation predicts a moderate increase in need (108 per year).</p> <p>Notes that AWI's modest estimates of</p>	<p>Outlined per FSU proposal.</p> <p>Particularly concerned with acquisition of qualified faculty per consultant's report.</p> <p>\$9M @ 20,000 per</p>

		<p>increased need takes into account Florida population growth.</p> <p>Raises fiscal concern if enrollments are not met due to higher admission requirements, and longer and more complex curriculum.</p>	<p>student would support 450 scholarships to Palmer Florida.</p>
<p>Consultants' Reviews of FSU Proposal</p>	<p>Placing a program at a state supported, research-intensive institution would be advantageous to the discipline of chiropractic; less is said on the reverse issue.</p>	<p>Argument presented for the need for more practitioners.</p>	<p>Concern raised of any institution's ability to acquire so many qualified faculty.</p>
<p>December 2004 DCU Briefing Paper</p>	<p>Questions whether a chiropractic program fits the profile, mission, and aspirations a large public four-year institution, with a young medical school, with designation by the Carnegie Classification as Research Extensive for its wide array of nationally recognized programs and doctoral productivity, and with aspirations to membership in the Academy of American Universities.</p>	<p>Florida ranks third nationally in numbers of chiropractic license holders, and above the national average in numbers of chiropractors per capita.</p> <p>Projected needs are for 108 new chiropractors per year.</p> <p>Palmer College of Florida estimates 188 graduates per year when fully operational.</p>	<p>Costs at chiropractic schools appear to be comparable to those of private postsecondary institutions.</p>

<p>February 2000 Legislatively Mandated Feasibility Study</p>	<p>It would be advantageous to place a chiropractic program at an institution with other health related offerings, listing seven such programs. Of the seven, FSU offers only three. Half of the Florida institutions thus judged had as many or more such programs than FSU.</p> <p>Placing a chiropractic program at an institution with a medical school could be “particularly problematic.”</p>	<p>Estimates 400-600 Floridians leave to study chiropractic (pre-Palmer Florida).</p> <p>Estimates of needed chiropractors in Florida are similar to those outlined in 12/04 DCU Briefing Paper.</p> <p>Florida is below national average in numbers of chiropractors per capita. (That figure has since changed, and Florida is now above the national average.)</p>	<p>Indicated that no infrastructure was in place at any Florida institution, private or public, and chiropractic would have to be built from the ground up.</p> <p>Urged discussions with Palmer Iowa regarding interests in locating a branch in Florida. (That institution has since been established.)</p>
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DEGREE PROPOSAL STAFF ANALYSIS
Doctor of Chiropractic: Florida State University

Estimated Costs:

	Total	% & \$ Current	% & \$ New	% & \$ C&G	Cost per FTE	SUS 02-03 Average Costs per FTE
Year 1	\$9,400,000	6% \$563,288	94% \$8,876,712	0	\$230,000	\$53,389 for Dentistry
Year 5	\$17,276,000	0	86% \$14,776,000	14% \$2,500,000	\$45,463	\$64,635 for Medicine

Projected FTE and headcount are:

	Projected Headcount	Student FTE
First Year	40	40
Second Year	100	100
Third Year	180	180
Fourth Year	280	280
Fifth Year	380	380

On April 30, 2003, the Florida Board of Governors approved eight criteria, divided into the two categories of Readiness and Accountability, by which implementation authorization of new doctoral and professional programs were to be assessed. The following is an analysis of the University's proposal based on further delineations of those eight criteria.

Evidence that the proposed program is listed in the current State University System Master Plan, and/or that the goals of the proposed program relate to the institutional mission statement as contained in the Master Plan

The program is not identified in any past or present SUS strategic planning documents, and its consistency with targeted areas outlined in the Board of Governors Y-Axis strategic planning tool, and with Florida State University's mission, is debatable.

Evidence of a relationship to specific institutional strengths

The program as proposed integrates chiropractic education with existing FSU master's degree programs to infuse a research component into the overall curriculum of study. Students will

matriculate through the chiropractic program and one of the affiliated master's programs at the same time, earning both degrees. Nutrition, Movement Science, Aging Studies, Public Health, and Health Policy are the existing degree programs that will be initially affiliated. This will allow the program to draw upon the strengths of the Colleges of Arts and Sciences, Nursing, Human Sciences, and Social Science.

Dr. Rand S. Swenson, DC, MD, PhD, and Associate Professor of Anatomy and Medicine at Dartmouth Medical School was retained as a consultant to review the proposal. Dr. Swenson indicated in his report that the proposed chiropractic program would benefit from its relationship with the integrated master's programs, and he also suggested that those programs (and others at FSU) might be enhanced by the addition of chiropractic education.

A February 2000 Board of Regents study regarding the feasibility of chiropractic at FSU suggested that it would be advantageous to place a chiropractic program at an institution with other health related offerings, listing seven such programs. Of the seven, FSU offers only three (medicine, nursing, exercise/movement science) and does not offer physical therapy, arguably the best fit. Half of the Florida institutions thus judged had as many or more such programs than FSU.

Evidence that planning for the proposed program has been a collaborative process involving academic units and offices of planning and budgeting at the institutional level, as well as external consultants, representatives of the community, etc.

The proposal provides a detailed timetable of events that contributed to planning for the chiropractic program. Discussion began in 1995 with members of the chiropractic profession and legislative leaders concerning FSU's exploring a new chiropractic educational program. The timetable outlines discussions, focus groups, seminars, and fact-finding visits to familiarize the institution with chiropractic education. In August 2002 FSU retained Dr. Alan Adams, DC, to oversee planning for a new chiropractic college and to lead efforts to develop a curriculum that would effectively infuse a research component into chiropractic education. The timetable also includes pertinent discussions with legislative leaders, the Governor's Office, and other governing entities.

Evidence of an appropriate timetable of events leading to the implementation of the proposed program

The proposal provides a detailed plan on pages 13-14 for hiring new faculty, recruiting students, adding equipment and facilities, and establishing clerkships. The plan is outlined in a table that identifies what action will take place each semester up until the program is fully implemented in 2012 and the first class is graduated.

Dr. David Wickes, Executive Vice President and Provost at Western States Chiropractic College, Portland, Oregon was retained as the second consultant to review the proposal. In his report he stressed the importance of such planning in order to allow sufficient time to recruit faculty and engage them in the course preparation process, and he had favorable remarks for the FSU proposal in this regard but concerns with regard to the ability to attract so many qualified faculty.

Evidence that progress has been made in implementing recommendations from program

reviews or accreditation activities in the discipline pertinent to the proposed program

No chiropractic program currently exists at FSU. However, several of the master's degree programs that will be closely associated have been reviewed. For these programs the proposal outlines the major findings of each review and provides information on steps taken to implement suggestions made for improvement. The programs reviewed include Nutrition, Food, and Movement Science, Nursing, Chemistry, Psychology, Social Work and Biology. Other programs which will be closely associated with chiropractic that have not undergone recent review include Aging, Public Health, and Health Policy Research. These programs will be reviewed in the established cycle of programmatic review.

Evidence of an appropriate, sequenced, and fully described course of study; evidence of specific learning outcomes and industry-driven competencies for any science and technology programs

The proposal outlines *“a competency-based curriculum that integrates existing Master's degrees in health related areas (Food and Nutrition, Movement Science, Aging Studies, Public Health, and Health Policy) with the Doctor of Chiropractic degree (D.C.)...The program is five years in length with full summer semesters for a total of 4530 D.C. contact hours and a combined Master's and D.C. just under 5000 contact hours, with the exception of the Master's Degree in Public Health. The total number of credit hours for the Doctor of Chiropractic degree is 175.”*

The curriculum follows the requirements set forth by The Council on Chiropractic Education, the accrediting agency for chiropractic education in the United States. The proposal states that clinical sciences compose 70 percent of the average chiropractic program and *“include chiropractic clinical education (hands-on manual techniques for diagnosis and treatment) and clinical internships (patient management under supervision, generally in outpatient clinics).”* Recent trends toward a more problem-based and self-directed learning approach to chiropractic education have also been taken into consideration within the design of the curriculum.

The University has also responded to the call both within and external to the profession for more scientific research related to chiropractic health care and a more evidence-based approach to professional practice. Five master's degree programs related to health science have been integrated into the overall curriculum and will provide students with education in scientific research methodology, as well as preparing them to pursue careers outside of private practice should they so choose. The proposal provides the following information about the integrated program and the five tracks that will be offered initially.

The integrated program emphasizes the following themes:

- *Science-based educational curriculum*
- *Evidence-based care and research*
- *Prevention, health promotion and wellness*
- *Complementary and integrative health care*
- *Health care information and quality improvement*
- *Patient-centered care with focus on special populations*

There are 5 Tracks and Specializations in the Integrated Program

M.S. Aging Studies & Doctor of Chiropractic

4995 Total hours

212 credits

<i>M.S. Food & Nutrition & Doctor of Chiropractic</i>	<i>4800 Total hours</i>	<i>211 credits</i>
<i>M.S. Movement Science & Doctor of Chiropractic</i>	<i>4905 Total hours</i>	<i>212 credits</i>
<i>M.S. Health Policy Research & Doctor of Chiropractic</i>	<i>4995 Total hours</i>	<i>208 credits</i>
<i>M.S. Public Health & Doctor of Chiropractic</i>	<i>5040 Total hours</i>	<i>214 credits</i>

The proposal also provides a curriculum outline for each track that shows an expected sequence of courses in which students will enroll. The coursework leading to the master's degree is expected to be accomplished within the first two and a half years of the program. It is not clear if the master's will be awarded at that time, or only after completion of the entire chiropractic program. Learning outcomes are provided for the chiropractic portion of the integrated program as well as for each of the master's programs.

Dr. Wickes indicated in his report that *“The five initial MS tracks at FSU (aging studies, movement science/exercise physiology, food and nutrition, health policy research, and public health) represent areas of marked pertinence to chiropractic practice and the chiropractic profession. Graduates of the dual DC-MS program would be better prepared than most other chiropractic school graduates to provide care to several important populations, including athletes and geriatric patients, to enter academic practice as a faculty member or researcher, or to contribute to public health policy and practice.”* Dr. Wickes also noted that, with the opportunity to design a curriculum from the ground up, FSU had chosen the traditional chiropractic curriculum over *“an integrated curriculum in which boundaries between disciplines are blurred and teams of basic and clinical sciences facilitate learning.”* However, he also noted that *“From an efficiency viewpoint, a traditional curriculum such as the one proposed is easiest to design and deliver.”*

Dr. Swenson remarked in his report that some of the students could be substantially ahead of others during the later stages of the chiropractic program, having taken similar coursework as part of their master's curriculum. This could offer some opportunities for streamlining some of the tracks. Dr. Wickes also called attention in his report to the time lapse between courses that should be taught in sequence, caused in large part by the dual-degree nature of the program. The example he used was *“fall year 2 students have a course in chiropractic palpation and analysis, which is critical to the development of chiropractic manual therapy skills, yet the subsequent course in chiropractic adjustive technique is not presented until one year later in the fall of year 3. This delay may result in diminished retention of information learned in the prerequisite courses.”*

Admission requirements to the proposed program are higher than the average requirements at existing chiropractic colleges throughout the United States. In addition, students admitted must meet the admission requirements for their selected master's degree track. These requirements are outlined starting on page 43 of the proposal and include a bachelor's degree with a minimum 3.0 GPA, and a minimum score of 500 on both the verbal and the quantitative sections of the Graduate Record Examination (GRE). A comparison of FSU admission requirements with three institutions chosen for peer comparison is also provided in Table Two-A.

The proposal section on curriculum also provides a very good side-by-side comparison of chiropractic education with medical education, showing the similarities that exist. It is pointed

out that undergraduate preparation for both professions is very similar, with essentially the same prerequisite courses. There is some mention of a pre-chiropractic track at FSU, but the proposal does not address whether the chiropractic program will be in direct competition for FSU pre-med undergraduates, or if it will become a second choice for those who are not accepted into medical school.

Another issue of concern is whether the program can be competitive in recruiting students, and therefore able to meet enrollment goals. Although tuition for the program will likely be lower than at private chiropractic schools, the greater length (5 years vs. 4 years) may dissuade some from applying. In addition, the higher admission standards may reduce the applicant pool. The challenge of matriculating through two graduate programs at the same time may also dissuade some applicants and also affect completion rates. The budget provided for the program is highly dependent on achieving enrollment targets.

Evidence that, if appropriate, the bachelor’s and master’s degree programs associated with the program are accredited and that the institution anticipates seeking accreditation for the proposed program if available

The curriculum follows the requirements set forth by The Council on Chiropractic Education (CCE), the accrediting agency for chiropractic education in the United States. Upon approval by the Board of Governors FSU plans “*to apply for programmatic accreditation with CCE and to file a substantive change document with the Commission of Colleges of the Southern Association of Colleges and Schools.*” No timeline for achieving accreditation is provided in the proposal; however, it would appear from the CCE accreditation standards that the process could begin immediately upon approval of the program and would take one to two years. Those integrated master’s degree programs for which special accreditation exists are all accredited.

Evidence that the proposed institution has analyzed the feasibility of providing all or a portion of the proposed program through distance learning technologies via its own technological capabilities, as well as through collaboration with other universities

Because many of the courses in the program have clinical components, years one through four will be delivered on-campus. Year five will be clinical clerkships at various locations around the state. The proposal states that:

The Chiropractic Program will utilize a variety of instructional and assessment strategies including:

- *Interactive lectures*
- *Computer enhanced instruction and simulation exercises*
- *Case-based small group tutorials*
- *Use of “standardized patients” in teaching and assessment*
- *Use of video feedback in skills labs*
- *Distance learning technologies including video conferencing in the distributed clinic system.*
- *Formative and summative assessment of clinical competencies with checklists and rating scales, log books, OSCE’s (Objective Structured Clinical Examination).*
- *National Board of Chiropractic Examiners (NBCE) Part I, II, and III examinations.*

The proposal indicates that some discussion has taken place between FSU and Palmer College Florida, and that Palmer College Florida officials are not in opposition to the proposed chiropractic program. However, there is no evidence that any discussion with regard to collaboration has taken place.

Evidence that there is a critical mass of faculty available to initiate the program based on estimated enrollments

Although none of the proposed faculty are currently in place to implement the program, there are sufficient faculty in place within the departments offering the affiliated master's programs to launch the program in Summer 2007. The proposal includes a timeline for recruiting the chiropractic program faculty needed to implement the program, and also additional faculty for the affiliated master's programs. This criterion is more applicable to an existing department that wishes to launch a doctorate program, and generally has little meaning for a completely new start-up program.

Dr. Wickes noted in his report that *"The proposal does not list the criteria for selection of the faculty members, nor does it contain any discussion of the process for the recruitment of new faculty members."* He also expressed concern that *"The difficulty that will be encountered by FSU will be the recruitment of highly qualified and experienced chiropractic physicians in the numbers required...recruitment will be a formidable task...A greater hurdle will be to attract chiropractic physicians with substantial research experience."* He felt that there was some potential for FSU to undermine the programs at existing private chiropractic colleges by hiring away their more experienced faculty.

Evidence that the faculty in aggregate have the necessary experience and research activity to sustain the program

There are no faculty in place for the chiropractic proposal, so this criterion is not really applicable. The faculty recruitment plan does offer a mix of disciplines that will support an active research program.

Evidence that, if appropriate, there is a commitment to hire additional faculty in later years, based on estimated enrollments

The proposal provides a detailed timeline for recruiting new faculty timed to coincide with anticipated enrollments. Table Two compares the projected program with three chiropractic schools outside Florida. Because the FSU program includes an affiliated master's program and a substantial research agenda, there will be 106.07 faculty FTE by year five to instruct 380 fulltime students. By contrast, New York Chiropractic College has 68 faculty and 710 fulltime students.

Evidence that library volumes and serials are sufficient to initiate the program

A core list of library holdings necessary to implement and maintain the chiropractic program was developed and compared against the current FSU library holdings. The University has in place 48 percent of the journals and 72 percent of the databases needed to start the program, but will need to purchase the majority of necessary books and additional journals and databases. Combined this equals \$238,355 for start-up, which has been built into the program budget and a schedule for acquisition has been included in the implementation timetable. The cost of annual library requirements have also been calculated starting at \$174,891 in 2006 and increasing with

inflation until 2012.

Dr. Wickes noted that there was no mention of “*non-print materials, such as videotapes/DVDs and computer media, ... which are essential in a chiropractic library. Also omitted from the budget was mention of a dedicated radiology interpretation library, either in an x-ray film format (which is increasingly difficult to obtain) or in an electronic format. All chiropractic colleges have dedicated radiology interpretation laboratories. These labs may contain x-ray viewboxes, computer stations, and either software collections or film libraries.*”

Evidence that classroom, teaching laboratory, research laboratory, office, and any other type of space necessary is sufficient to initiate the program

The proposal states that existing space is inadequate to implement the program and that new facilities will be necessary. These facilities include the new Classroom Building partially funded in 2004-2005 and the planned Life Science Building. The Life Science Building is critical to implementation of the chiropractic program, as noted in the proposal.

The proposal states, “*Many of the classroom needs will be met using the new Classroom building. The classroom building received \$8 million general revenue funds in 2004-05. With the addition of another \$8 million from the first year funding pursuant to Chapter 2004-2, Laws of Florida, the classroom building is scheduled to open in 2007. Additional space for offices, key teaching laboratories and faculty research will be located in renovated and other new space to be funded on a phased basis from the current appropriation. There will be limited clinical facilities within the renovated space. A second year commitment for these funds may be necessary if funding is not provided to complete the Life Science Building. The Life Science Building is priority 3 on the FSU Five-Year Capital Improvement list. The Life Science Building is critical for the sequence of events to take place for implementation of the Complementary and Integrative Health program.*”

Evidence that necessary and sufficient equipment to initiate the program is available

Essentially all of the equipment needed to implement the program will need to be purchased. A schedule for doing so is included in the implementation timetable, and associated dollars are included in the budget projections. A detailed list of necessary equipment and clinical support material is provided in the proposal.

Evidence that, if appropriate, fellowships, scholarships, and graduate assistantships are sufficient to initiate the program

The proposal states that “*No fellowships, scholarships or graduate assistantships are anticipated to be funded from state resources. Proceeds from endowment earnings or grant funds will be used for this purpose.*” Potential sources for contract and grant dollars are identified, and the projected budget for year five includes \$2,100,000 for other personnel services (OPS) from contracts and grants funds.

Evidence that, if appropriate, clinical and internship sites have been arranged

The proposal provides information about internships required as part of the integrated master’s programs and also those required for chiropractic clinical training. It is not clear if internship sites already exist for the integrated master’s degree programs, but it is clear in the proposal that

all of the chiropractic sites will need to be established. Summer term of year three is when students are expected to do their integrated master's internship. Year five of the chiropractic curriculum is dedicated to clinical clerkships.

Evidence that there is a need for more people to be educated in this program at this level

The proposal provides an argument for a moderate increase in chiropractic physicians based upon labor market data and information about changes in healthcare laws and delivery systems that affect the chiropractic profession. Labor market projections by key government forecasters are somewhat conflicted, with the U.S. Bureau of Labor Statistics predicting a fairly significant increase nationally (21-35 percent), while the Florida Agency for Workforce Innovation (AWI) projects a modest increase (1.58 percent) in the demand for new chiropractors in Florida. Key arguments made to support need and demand are outlined below, followed by staff comments.

Overall Growth in Healthcare and Population

- ! Healthcare expenditures have grown significantly faster over the last quarter century than either the population or the economy as a whole - Over 15.2 million or 7.5 percent of adults had used chiropractic care in the previous year
- ! Florida is expected to grow from 17.5 million people in 2004 to 20.0 in 2011 (Florida Demographic Estimating Conference, October 2004) and much of this growth will be in older citizens whose healthcare needs are greater
- ! With the general aging of the state's population, a variety of illnesses such as back pain are likely to increase - among complementary and alternative medicine provider-based therapies commonly used by *older adults*, chiropractic has the highest utilization

It is reasonable to expect an increase in demand for chiropractic care in direct proportion to the overall increase in healthcare services, providing that public confidence in such care remains strong and access levels remain constant or increase.

With a lower ratio equating to better access to chiropractic care, the ratio of chiropractic doctors to population in Florida is 1/3410, which is slightly better than the national average of 1/3788.

Labor Market Projections for Employment of Chiropractic Physicians

- ! US Bureau of Labor Statistics projects that nationally employment of chiropractors is expected to grow faster than the average for all occupations (23 percent by 2010) and more than 10,000 openings will become available nationwide
- ! In 2004, the Florida Agency for Workforce Innovation (AWI) estimated employment of chiropractors would grow by 407 between 2003 and 2011 with an annual growth of 1.58 percent and 108 openings
- ! AWI projections are based on current rates of utilization (approximately 7.5 percent), but if utilization increased to 10.0%, then the need for chiropractors (at 200 days per year, 16 visits a year /person, and 25 patients per day per physician) would grow to 4160, requiring almost 500 more chiropractors than Workforce Agency estimates

The argument for expansive growth in chiropractic employment opportunities remains relatively weak. Increases in state population are taken into account when AWI makes its employment projections, so speculation that a 2.5 percent increase (7.5 to 10) in chiropractic usage by

healthcare consumers would lead to a 50 percent increase in the number of practitioners needed may be overly optimistic. Palmer College of Chiropractic Florida expects to graduate 188 students per year starting in 2006, which is more than sufficient numbers to cover AWI projected openings in Florida. However, it is highly unlikely that any graduate from the proposed FSU program would have trouble working in the field, since most chiropractic doctors are in private practice.

Increasing Interest in Complementary and Alternative Medicine

- ! Congress, the National Institute for Health, and the Department of Defense have expressed more interest in Complementary and Alternative Medicine - National Center for Complementary and Alternative Medicine created in 1998 with a current annual budget of more than \$117 million to study, train researchers and disseminate information on these healthcare practices
- ! The 2003 Florida Legislature revised the workers compensation law to enable Chiropractors to serve as a portal of entry for healthcare – previously, they could only get referrals from M.D.s and D.O.s
- ! Expansion of chiropractic coverage among health insurers will provide greater access to chiropractic care, which is now a covered benefit in Medicare, Medicaid, Florida Worker’s Compensation, and personal injury insurance plans
- ! Increased of interest in chiropractic care as a cost-effective alternative to traditional medicine has been demonstrated in data about seekers of healthcare

It is reasonable to expect that changes in government health programs and private insurance plans that increase the affordability of chiropractic care will also increase access for many healthcare consumers. This in turn may affect the projected need for new chiropractic doctors. Many of these changes are fairly recent, and it is therefore difficult to predict with any certainty the scope of their impact on chiropractic care.

Access for Florida Citizens to Chiropractic Education

- ! It is estimated that between 350 – 400 Florida residents are enrolled in one of the nation’s 18 chiropractic colleges, all of which are private - Only one is in Florida, a branch campus of Palmer College of Chiropractic in Port Orange
- ! Florida residents are penalized for not having a public in-state educational option because tuition at the nation’s private chiropractic colleges is higher than it would be at Florida State University
- ! A public chiropractic program will help address the need for minority health care providers as the nation becomes increasingly diverse - African Americans and Hispanics comprise only 1.2 percent of the chiropractors in the U.S. and less than 2 percent in Florida

Florida residents are not “penalized” because they have to enroll in private chiropractic colleges and pay higher tuition and fees. Since there are no public chiropractic programs anywhere in the U.S., students in all states face the same costs. Annual tuition and fees at Palmer College of Chiropractic Florida is approximately \$20,000. While most of Palmer College’s students are from out-of-state, the proposal states that 143 are from Florida. Implementation of an aggressive scholarship program for Florida residents to attend private colleges would have the potential to

increase that number significantly. For example, a nine million dollar annual appropriation for such a scholarship program would fund 450 students to attend Palmer or another similarly priced private institution. FSU proposes to have 380 students at full implementation.

Dr. Swenson indicated in his consultant's report that a chiropractic program at a public institution may be more effective in attracting minorities because of the decreased cost of attendance.

Potential for Improving Chiropractic Education and Practice

- ! Critics of, and leadership within the chiropractic profession agree on the need for increased research with regard to the efficacy and cost effectiveness of chiropractic care.
- ! Many private chiropractic colleges in this country have introduced greater scientific rigor into the curriculum and are focusing on Evidence Based Treatment (EBT) protocols.
- ! Private chiropractic colleges have a limited capacity to develop the infrastructure and culture necessary to increase research productivity because they are financially dependent on tuition and fees.
- ! There are established chiropractic programs in multi-discipline university environments in Great Britain, Canada, Australia, Denmark, and South America – but none of significance in the U.S.
- ! Implementing chiropractic study at a U.S. public universities will assure the continuity and consistency of quality, content, and research as chiropractic care is increasingly integrated with the other healthcare professions.
- ! A new Complementary and Integrative Health research program at FSU would be the first major multi-discipline Complementary and Integrative Health research program in the United States.
- ! The Chiropractic and Biomechanical Research Center already established at FSU is in a good position to draw additional funding from the NIH National Center for Alternative and Complementary Medicine.

This is perhaps the strongest argument offered in support of the proposed program. Research conducted on the efficacy of chiropractic techniques would be of value to the profession and the general public good, as well as informing future curricula development. Dr. Wickes wrote in his report that *“There is an increasing demand for evidence-based, scientific chiropractic healthcare by consumers and other healthcare professionals”* and that this was an *“opportunity for FSU to take a leadership position in research related to chiropractic and other forms of complementary medicine, and to tap into the steadily increasing grant money for this purpose.”*

However, FSU does not need to implement a chiropractic degree program in order to participate in chiropractic research. Most of the extramural research funded by the National Center for Complementary and Alternative Medicine has not been targeted at chiropractic care, and for the most part the organization's grants have been awarded to medical schools and research universities with strong biomedical programs. FSU can already compete for a share of these grants through its Chiropractic and Biomechanical Research Center in collaboration with the Biomedical Science Department and Medical School.

Evidence that the proposed program does not duplicate other SUS or independent college

offerings or, otherwise, provides an adequate rationale for doing so

The proposed program does not duplicate any other state university program in Florida, but it does duplicate the program being offered at Palmer College of Chiropractic Florida, located in Port Orange. The proposal indicates that some discussion has taken place between FSU and Palmer College, and that Palmer College officials are not in opposition to the proposed chiropractic program. Division of Colleges and Universities staff also contacted Palmer College and determined that they were not concerned about the FSU program having a negative impact on their operations.

Evidence of reasonable estimates of student headcount and FTE who will major in the proposed program, and commitment to achieve a diverse student body

The proposal states that over 100 inquiries have been received from individuals interested in attending the proposed program, and that 350-400 Florida residents are currently enrolled in private chiropractic colleges. Enrollments will be kept low in the first two years as the university builds out its infrastructure to offer chiropractic education. Students will be primarily matriculating through the integrated master's programs during this period.

Evidence of a budget for the program that is complete, reasonable, comparable to the budgets of similar programs at other SUS institutions, and reflective of the proposal's text

The proposal provides a detailed budget table that addresses the key costs identified in the proposal narrative. Requirements for faculty, support staff, library resources, facilities, equipment, clinical externship support, and administrative overhead have been carefully calculated and their funding accounted for in the budget projections.

The proposal states on page 73 that FSU could not implement the chiropractic program without the \$9 million annual appropriation provided in Chapter 2004-2 Laws of Florida. This is somewhat consistent with the funding process for other professional level programs in the SUS. Funding at a consistent rate through legislative appropriations and student tuition are necessary to maintain the programs. However, each session of the Florida Legislature is considered to be a separate entity and can make changes to appropriations made in previous sessions.

In addition, the University expects that student tuition and fees will generate \$5.5 million to supplement the ongoing appropriation, based upon a targeted enrollment of 100 students annually. Although there is no immediate indication that FSU will have any trouble meeting their enrollment projections, there are a number of factors that could inhibit their ability to do so. These include changes in federal financial aid, changes in law governing chiropractic practice, competition from private chiropractic colleges that might move into Florida, and the program's higher admission standards and length.

Evidence that, in the event that resources within the institution are redirected to support the new program, such a redirection will not have a negative impact on undergraduate education

There will be no redirection of resources from other programs. It is expected that some of the faculty effort in year one will be absorbed by the participating integrated master's programs, but this will be eliminated in year two with the addition of faculty dedicated to the College of Complementary and Integrative Health.

Evidence that the academic unit(s) associated with this new degree have been productive in teaching, research, and service.

Evidence is provided that the integrated master's degree programs have been productive in teaching, research, and service. However, the academic unit which will house the chiropractic program has not been created as yet, so there can be no meaningful evaluation of its productivity.
