



2025 Senate Bill 2129  
Senate Workforce Development Committee  
Senator Mike Wobbema, Chairman  
February 14, 2025

Chairman Wobbema and members of the Senate Workforce Development Committee, I am Dr. Kris Anderson, a practicing chiropractor in Grand Forks. I am representing the North Dakota Chiropractic Association (NDCA), and on behalf of the organization, I testify in support of Senate Bill 2129 with a specific amendment that surfaced following the January 30<sup>th</sup> committee workgroup meeting.

The NDCA respectfully submits an additional amendment regarding complementary, alternative, and integrative therapies. During the committee workgroup meeting on January 30<sup>th</sup>, Dr. Sara Lyons, representing the ND Veterinary Medicine Board of Examiners, testified that chiropractic is a defined part of veterinary medicine, which is true. In fact, chiropractic has been part of the definition of veterinary medicine since 1997, and SB 2129 will remove chiropractic from the definition. The concern is that, in nearly 30 years, no rules have been written to describe the practice of animal chiropractic. The lack of rules or other descriptions of chiropractic is a source of confusion for the public and members of our association who are trained to perform animal chiropractic services.

Animal chiropractic certification programs are post-graduate courses requiring participants to be either a licensed DVM or DC. The curricula are 200-300 hours with multiple on-site modules and supplementary online content. Those professionals who become certified animal chiropractors have certainly made a significant investment and cleared a high bar to do so.

Animal chiropractic is not a recognized specialty by the American Veterinary Medical Association (AVMA). The AVMA and the American Association of Veterinary State Boards (AAVSB) do recognize animal chiropractic in their model practice acts as *complementary, alternative and integrative*, which is not part of the normal practice of most veterinarians. In

fact, SB 2129 draws directly from the AVMA language on page 2, beginning at line 19, when defining “Complementary, integrative, and alternative therapies.”

*"Complementary, alternative, and integrative therapies" means a heterogeneous group of preventive, diagnostic, and therapeutic philosophies and practices that are not considered part of conventional (Western) medicine as practiced by most veterinarians and veterinary technicians/technologists. **These therapies include, but are not limited to, veterinary acupuncture, acuthery, and acupressure; veterinary homeopathy; veterinary manual or manipulative therapy (i.e., therapies based on techniques practiced in osteopathy and chiropractic medicine); veterinary nutraceutical therapy; and veterinary phytotherapy. (emphasis added)***

The added emphasis to the second sentence is due to it being omitted from the text in SB 2129. We understand the point of view that specific examples should not be included in the century code and that the second sentence was likely removed in response to advice from the legislative council. Still, the additional examples are clarifying and help people understand what is and what is not part of the practice of veterinary medicine.

Despite the expectation that the legislative council may advise against it a second time, we recommend that SB 2129 be amended to include the full description of *complementary, alternative, and integrative therapies* from the AVMA Model Practice Act.

SB 2129 strikes all direct references to animal chiropractic from the law. Doing so further complicates the provision of animal chiropractic services in ND. Currently, only a DVM is allowed to perform such services under the law. In practice, it is common for DVMs to refer to local DCs for animal chiropractic services. SB 2129 needs to ensure the provision of animal chiropractic services is clearly defined.

We recommend that it be stated that the board shall adopt rules regarding manual or manipulative therapies, such as animal chiropractic. Such therapies should be defined as post-graduate skills that can be performed by those with necessary advanced training, up to and including certification. We recommend animal chiropractic services be performed by professionals whose license already allows them to perform manual or manipulation services in ND, such as DCs, PTs, or DOs if they are supervised or with a referral from a DVM.

Lastly, we recommend that animal chiropractic services may also be performed by those who have completed a recognized certification program. Anyone who is certified must first notify their licensing board and the board of veterinary medicine of their intent to provide animal chiropractic services in ND and submit documentation of their certification.

Our recommendations respect the autonomy of those DVMs who want to continue providing integrated services to their client patients while also allowing those who become certified to practice under the protection of the law. Further, it removes the burden on the State Board of Veterinary Medicine Examiners to wield its authority exclusively for licensed DVMs when, in fact, their duty is to the public.

Respectfully,

NDCA Board of Directors