



April 13, 2026

The Honorable Aisha Wahab
Chair, Senate Business, Professions and Economic Development Committee
1021 O Street, Suite 8530
Sacramento, CA 95814

RE: SB 1269 (Ochoa Bogh) – Chiropractors: Animal chiropractic practitioners
POSITION: OPPOSE

Dear Chair Wahab,

Collectively representing more than 120,000 veterinary medical professionals throughout the State of California and across the country, the California Veterinary Medical Association (CVMA), Southern California Veterinary Medical Association (SCVMA), Sacramento Valley Veterinary Medical Association (SVVMA), and American Veterinary Medical Association (AVMA) are strongly opposed to SB 1269 by Senator Ochoa Bogh. This bill would allow chiropractors to expand their practice to work on animals without veterinary supervision and creates a concerning new “direct access” model of care.

Last year, our coalition opposed a similar measure, SB 687 by Senator Ochoa Bogh, which was held in the Senate Business, Professions and Economic Development Committee. The Committee elected to hold an informational hearing on August 25 to examine the issue of allowing human chiropractors and physical therapists to perform unsupervised work on animals. Our coalition appreciated the thoughtful and detailed approach taken by the Chair and Committee staff in the informational hearing and the breadth of perspectives heard during testimony.

Given the feedback provided during that hearing, it was surprising to see this year’s emergence of SB 1269, which takes a decidedly more aggressive approach to allowing human chiropractors to perform unsupervised work on animals. Most notably, the bill creates a path whereby a chiropractor could work on an animal without any prior engagement from the animal’s veterinarian. In fact, the bill allows for a new classification of profession – the “*animal chiropractic practitioner*” – to “*provide animal chiropractic without supervision by a licensed veterinarian for the first three months or eight visits of care, whichever comes first. After this initial period, the animal chiropractic practitioner shall refer the animal owner and patient back to the primary treating veterinarian for followup [sic] examination.*”

(Page 3, lines 36-39 and page 4, lines 1-2.) Later, the bill states: “*If the animal owner does not have a primary veterinarian, the animal chiropractic practitioner shall provide references to veterinarians that the owner can utilize.*” (Page 4, lines 35-37). Indeed, the bill requires the “intake” form provided to the potential customer to indicate “whether the animal has been seen by a licensed veterinarian within the past 12 months” but does not prohibit the animal chiropractor from proceeding with treatment of the animal in the absence of a prior veterinarian examination. These provisions collectively attempt to create a “direct access” model that to completely bypasses early and ongoing involvement of a veterinarian in the care of the animal, and instead allows a chiropractor to be the first (and only) point of contact and treatment. The coalition can’t underscore enough how potentially dangerous it would be to allow clients and their animals to utilize the services of a chiropractor without first receiving an initial (and ongoing) examination of the animal from a veterinarian.

Additionally, our coalition asks for your consideration of the following points:

A. Animal Musculoskeletal Manipulation (MSM) is the practice of veterinary medicine, and should be performed by or under the direct supervision of veterinarians

Over three decades ago, the California Veterinary Medical Board (CVMB) promulgated California Code of Regulations Title 16, section 2038 (hereinafter, “Section 2038”) which creates a pathway for human chiropractors to work on animals under the direct supervision of a veterinarian. Drafted in partnership with the California Chiropractic Board, the CVMA, and the California Chiropractic Association, Section 2038 has been successfully forging collaborative working relationships between chiropractors and veterinarians for over 30 years. It defines MSM as “the system of application of mechanical forces applied manually through the hands or through any mechanical device to enhance physical performance, prevent, cure, or relieve impaired or altered function of related components of the musculoskeletal system of animals.” Section 2038 further states that “MSM when performed upon animals constitutes the practice of veterinary medicine,” placing it squarely within the practice of veterinary medicine as defined in California Business and Professions Code section 4826(c).

The rulemaking process that resulted in Section 2038 was open and fair, and welcomed all stakeholders to present information to help the CVMB craft a regulation that best served the interests of animals and consumers alike. The resulting regulation clearly delineated the responsibilities of both the supervising veterinarian and the chiropractor in delivering MSM services to animal patients and continues to safeguard animal welfare by providing a straightforward roadmap for veterinarians and chiropractors to follow relative to the use of MSM on animals. Distilled to its essence, Section 2038 permits animal-directed MSM to be performed by (1) veterinarians, and (2) licensed California chiropractors working under the direct supervision of a veterinarian.

B. Chiropractors have no animal-related training in their licensing curricula

SB 1269 would override the above-described clinical framework by allowing chiropractors to perform MSM¹ “without supervision by a licensed veterinarian.” Allowing chiropractors to work on animals without veterinary supervision poses a threat to both animal welfare and consumer protection for the following reasons:

- 1) *Chiropractors learn only about human beings in their core education.* Vast anatomic, physiological, and behavioral differences exist between human beings and animals. For that matter, significant differences exist between animal species. In addition, animals obviously

¹ MSM is denoted in SB 1269 as “animal chiropractic.”

cannot speak and will instinctively hide signs of pain. Not only is animal-specific instruction and training absent in a chiropractor's education, but also the training in *human* anatomy and physiology that chiropractors receive *does not* safely permit chiropractors to practice on animals without veterinary supervision.

- 2) *Chiropractors have no formal training or aptitude testing to address emergency conditions in animals.* Currently, if a human suffers a health emergency on a chiropractor's premises, the chiropractor can call 911 and have paramedics promptly arrive. Because there is no 911 equivalent for animals, animals experiencing a health crisis resulting from or occurring during chiropractic treatment will not receive emergency care if treated at a facility that does not have veterinary licensees present. In that regard, veterinary practices are required by law to be equipped with emergency medical equipment and drugs to treat emergencies that could arise from procedures being performed on the premises.
- 3) *Many complex animal conditions that mimic a chiropractic issue can be more acute medical problems; chiropractors are not trained to identify those conditions.* When an animal limps, is stiff, sore, or has decreased ability or desire to move, many unknowing pet owners will instinctively seek a chiropractor to address the issues. Unfortunately, there are hundreds of medical conditions in animals that can mimic chiropractic issues. To make matters worse, many of them have an insidious onset, making them difficult to identify early on when intervention is most effective. A mere certification program in the absence of an animal-specific core curriculum (discussed further in the next section) cannot adequately educate chiropractors on all of these conditions across all animal species and thus would subject animals to a delay in appropriate treatment, prolonged suffering, and severe adverse health effects from not having their medical condition properly identified and treated. In addition, consumers will spend more money on a treatment that is potentially tangential to their animal's core issue. Only veterinarians possess the level of education and training needed to diagnose and treat these conditions, yet SB 1269 paradoxically permits chiropractors to work on animals *without* veterinary supervision, removing veterinarians entirely from what is legally defined as veterinary care.

C. Certification is inadequate to permit unsupervised veterinary practice

Currently, there are approximately eight certification programs in the United States that offer animal-centric training to chiropractors and do so via online self-study and/or a few weekend classes (except for a couple of programs that are live/in-person.) Because the core education of chiropractors is focused on a very specific facet of human medicine, the certifications offered in animal chiropractic do not give chiropractors the necessary education or experience needed to safely manage animal patients without veterinary supervision. Among the glaring omissions resident in these certification programs are:

- No education in multiple species (programs focus on horse and dog models)
- No minimum requirement for live in-person education (even though MSM is the very definition of "hands-on" practice)
- No practice restriction for those who perform poorly in the course
- No continuing education requirement
- No obligation to meet ongoing minimum standards of care

D. SB 1269 would allow chiropractors to practice on animals without veterinary supervision or involvement of any kind

California's Veterinary Medicine Practice Act—specifically, 16 CCR section 2034—defines two types of veterinary supervision: “Direct” and “indirect.” “Direct” supervision means that the veterinarian has established a Veterinarian-Client-Patient Relationship (VCPR) through examination of the animal and communication with the client, and is present on the premises while veterinary staff perform a treatment. “Indirect” supervision means that the same VCPR is established, but the veterinarian is not present on the premises while veterinary staff perform a treatment under direct veterinarian treatment orders. For example, under “indirect supervision,” a registered veterinary technician (RVT) could be instructed by a veterinarian to give a pill to an animal every 4 hours if the veterinarian had to be offsite during that time.

In contrast to this fundamental supervisory framework, not only does SB 1269 fail to provide for any type of veterinary supervision, but it also *explicitly authorizes* chiropractors to practice a defined portion of veterinary medicine without *any* participation by a veterinarian. Put simply, SB 1269 would allow a chiropractor to “hang out their own shingle” and perform work on an animal without any veterinarian having examined the animal beforehand (as mentioned above), without any veterinarian being aware of the chiropractor's treatment, and without any veterinarian being present during the appointment. Under that rubric, unsuspecting consumers will wrongly assume that all protections will be in place at a chiropractic facility to provide for the safety and proper veterinary medical care of the animal. Such will not be the case.

E. The veterinary profession provides chiropractic services and existing California law provides a pathway for chiropractors to do the same

While sponsors may argue that SB 1269 addresses an “access to care issue,” that is simply not the case. Hundreds of California veterinarians possess animal chiropractic certification, which—when coupled with their Doctorate in Veterinary Medicine—provides consumers with comprehensive chiropractic care in addition to traditional veterinary services. Moreover, and as mentioned at the outset of this letter, Section 2038 permits chiropractors to also work on animals provided that they do so under veterinary supervision. In the case of a registered veterinary premises, the veterinarian must be in the building when the chiropractor is seeing patients. In the case of a “range setting,” the veterinarian must be in the general vicinity when the chiropractor is seeing patients. These scenarios provide for patient safety and consumer supervision that adequately protects California's consumers and animals.

F. Chiropractors would be completely exempt from the Veterinary Medicine Practice Act

Deep on page 6 of the bill (lines 9-12) is language which completely exempts animal chiropractors “from the provisions of the Veterinary Medicine Practice Act (Chapter 11 (commencing with Section 4800)). The effect of this language is in direct conflict with the section above that would ban an animal chiropractor from engaging in “any service or act...that would constitute the practice of veterinary medicine.” The inclusion of that language is a non-starter for the CVMA and the other members of the coalition, as it is clearly an attempt by chiropractors to encroach on the practice of veterinary medicine in a more global manner.

Thank you for your consideration.




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