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ACA CHIROPRACTORS



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Jan. 5, 2021

Ms. Beth Taylor  
Chief Nursing Officer  
Veterans Health Administration  
810 Vermont Avenue, NW  
Washington, DC 20420

**RE: RIN 2900-AQ94-Authority of VA Professionals to Practice Health Care**

Dear Ms. Taylor:

The American Chiropractic Association (ACA) appreciates the opportunity to comment on the Interim Final Rule, RIN 2900-AQ94-Authority of VA Professionals to Practice Health Care released on Nov. 12, 2020.

ACA is the largest professional organization in the United States representing doctors of chiropractic (DCs). ACA members lead the chiropractic profession through collaborative relationships in public health, support for research and evidence-based practice, and the active reporting of functional outcome assessment measures to ensure the health and well-being of the estimated 35 million Americans who seek chiropractic care each year.

ACA appreciates the Department of Veterans Affairs' (VA) willingness to engage with stakeholders while developing a new plan to further increase patient access to care. As you are aware, chiropractic services have been available in the VA for most of the last two decades, after Congress enacted a series of statutes (PL 107-135 and PL 108-170) that included specific directives instructing the VA to hire DCs and place them at VA healthcare facilities. Today, following further congressional (PL 115-141) and VA action, chiropractic services are available at more than 125 sites<sup>1</sup> and the through the VA Community Care Program.

In addition, research has shown<sup>2</sup> the exponential growth of chiropractic services at the VA, going from 4,052 patients seen at VA clinics in 2004, to 37,349 patients in 2015—an 821 percent increase. The chiropractic benefit is popular within the veteran community, as exemplified at a 2017 Senate hearing where a representative from the American Legion testified that it views access to chiropractic care as a “priority necessity for veterans.”<sup>3</sup>

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<sup>1</sup> <https://www.prosthetics.va.gov/chiro/locations.asp>

<sup>2</sup> Lisi, A.; Brandt, C: Trends in the Use and Characteristics of Chiropractic Services in the Department of Veterans Affairs; JMPT: June 2016

<sup>3</sup> Hearing before the Committee on Veterans Affairs; U.S. Senate, 115<sup>th</sup> Congress, First Session; May 17, 2017

It is ACA's understanding that the purpose of this VA interim rule is to confirm that healthcare providers may practice consistent with their employment in the VA, notwithstanding any state licensure, registration or any other requirements that may unduly inhibit their ability to practice. Additionally, we understand that the interim final rule confirms VA's current practice of allowing healthcare professionals to deliver services in a state other than their state of licensure or certification and confirms VA's authority to establish national standards of practice for healthcare providers who practice at VA medical facilities.

ACA has always believed that chiropractors should be allowed to practice to the fullest extent of their education and training and that we participate in the healthcare community through collaboration and integration.<sup>4</sup> That said, ACA applauds VA for its efforts, through this interim rule, to increase veteran access to health care. We stand at the ready to work with VA to develop and finalize this plan and make this goal a reality.

ACA appreciates the opportunity to provide comments on this matter. If you have any questions regarding our remarks, please contact John Falardeau, ACA senior vice president of public policy and advocacy, at [jfalardeau@acatoday.org](mailto:jfalardeau@acatoday.org) or at (703) 812-0214.

Sincerely,

A handwritten signature in black ink that reads "Robert C. Jones, DC". The signature is written in a cursive, flowing style.

Robert C. Jones, DC  
President  
American Chiropractic Association

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<sup>4</sup> <https://www.acatoday.org/About/Mission-Vision>