



March 24, 2020

Mr. Christopher C. Krebs
Director
Cybersecurity and Infrastructure Security Agency (CISA)
Department of Homeland Security
Washington, DC 20528

RE: MEMORANDUM ON IDENTIFICATION OF ESSENTIAL CRITICAL INFRASTRUCTURE WORKERS DURING COVID-19 RESPONSE, dated March 19, 2020

Dear Mr. Krebs:

1701 Clarendon Blvd
Suite 200
Arlington, VA 22209

TEL 703 276 8800
FAX 703 243 2593
WEB acatoday.org

On behalf of the American Chiropractic Association (ACA), representing the nation's doctors of chiropractic (DCs) and the patients they serve, we would like to thank you and the agency for your work in combating the novel coronavirus (COVID-19) pandemic.

ACA is concerned, however, that in the directory identifying essential Healthcare/Public Health caregivers in the document listed above, doctors of chiropractic or chiropractors, are not listed. We are hearing from many of our members that this omission is causing confusion and uncertainty at the state and local levels of government.

As portal-of-entry healthcare providers, doctors of chiropractic are educated and licensed to diagnose, treat, and co-manage patients. Our doctors work in private practices, multi-disciplinary clinics and hospitals. They are trained to refer patients to other healthcare providers when necessary. In a healthcare system being stretched to its limit, DCs can be a valuable resource to tap for additional patient support. Also, under federal statute, chiropractors have *physician* status in Medicare, the largest health system in the nation (Social Security Act §1861(r)5).

Doctors of chiropractic are primary-contact healthcare providers who provide *essential care*, including (but not limited to) managing acute and urgent musculoskeletal conditions. These services are critical for managing cases that otherwise could end up in emergency rooms, worsening an already difficult situation. It is important to note that chiropractic services also keep in place healthcare providers, first responders and others who have physically demanding jobs that support critical infrastructure, such as truck drivers who continue to ensure that America's healthcare and food supplies get to where they are needed during the COVID-19 pandemic.

As they provide this essential support, doctors of chiropractic share the public health responsibility of slowing the transmission of COVID-19. Chiropractic practices that attend to urgent cases must employ strict hygienic practices at every point of patient contact and keep up to date with prevention recommendations from the Centers for Disease Control and Prevention (CDC). In addition, ACA has urged all chiropractors to closely monitor state and local health authorities and to comply with any relevant guidance or mandates.

We want you to know that America's doctors of chiropractic—more than 70,000 strong—stand ready to serve in this national crisis. Along with the Administration and the states, we are committed to eradicating this dreadful disease, which has put much of the world at risk and threatens to overwhelm the U.S. healthcare system.



A M E R I C A N
CHIROPRACTIC
ASSOCIATION

Please consider amending the essential critical infrastructure memorandum referenced above to include doctors of chiropractic or chiropractors. I am prepared to speak in more detail about how members of the chiropractic profession can be of greater service to your efforts and the communities in which they work and live. You can reach me at (703) 812-0214 or via email at jfalardeau@acatoday.org. Thank you in advance for your attention in this regard.

Sincerely,

A handwritten signature in black ink that reads 'John Falardeau'. The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

John A. Falardeau
Sr. Vice President

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