



1701 Clarendon Blvd TEL 703 276 8800
Suite 200 FAX 703 243 2593
Arlington, VA 22209 WEB acatoday.org

ACA CHIROPRACTORS  Hands down better™

Dec. 17, 2021

Steven Lieberman, MD, MBA, FACHE, FACP
Acting Under Secretary for Health
Veterans Health Administration
U.S. Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20571

Re: Department of Veterans Affairs (VA) FR Doc No: 2021-22535, Docket VA2021-VHA-0026, Proposed Rule – Medical Benefits Package; Chiropractic Services

Dear Dr. Lieberman:

The American Chiropractic Association (ACA) appreciates the opportunity to comment on the *Department of Veterans Affairs (VA) FR Doc No: 2021-22535, Docket VA2021-VHA-0026, Proposed Rule – Medical Benefits Package; Chiropractic Services* released on October 21, 2021. 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 enthusiastically supports this proposed rule, as it comes in response to a provision included in the Consolidated Appropriations Act of 2018 (P.L. 115-141), adding chiropractic services to the definition of “medical services” under Title 38 of the United States Code. The proposed rule also includes chiropractic services under the definition of “rehabilitative services,” and adds chiropractic examinations and services to the definition of “preventive services” in U.S. Code.

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 180 sites¹ and the through the VA Community Care Program. The chiropractic benefit is popular within the veteran community, as


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

exemplified at a 2017 Senate hearing where a representative from the American Legion testified that it views access to chiropractic services as a “priority necessity for veterans.”²

This proposed rule comes at a time when the need for drug-free options for musculoskeletal conditions is urgent. VA data cites “diseases of the musculoskeletal system/connective system” as the number one ailment experienced by veterans returning from Operations Enduring Freedom/Iraq Freedom/New Dawn (OEF/OIF/OND) who access VA treatment.³ Moreover, research shows that, similar to the civilian population, many veterans struggle with prescription painkiller (opioid) addiction, and of the nearly one-third of OEF/OIF/OND veterans receiving chiropractic services who also received an opioid prescription, the frequency of opioid prescriptions was lower after the index chiropractic visit than before.⁴

ACA appreciates the opportunity to comment on the proposed rule and we look forward to continued engagement with VA as we work towards our shared goal of providing high quality care to veterans.

Sincerely,

A handwritten signature in black ink, appearing to read "Michele Maiers", is written over a light gray rectangular background.

Michele Maiers, DC, MPH, PhD
President

² Hearing before the Committee on Veterans Affairs; U.S. Senate, 115th Congress, First Session; May 17, 2017

³ <https://www.publichealth.va.gov/epidemiology/reports/health-care-use-gulfwar-oefoifond/index.asp>

⁴ Lisi, Corcoran, DeRycke, Goertz, et. al. Opioid Use Among Veterans of Recent Wars Receiving Veterans Affairs Chiropractic Care; *Pain Medicine*, Volume 19, Issue suppl_1, September 2018, Pages S54–S60