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Comment On: IRS-2010-0010-0001

Group Health Plans and Health Insurance Coverage: Interim Final Rules for Relating to Status as a Grandfathered Health Plan under the Patient Protection and Affordable Care Act

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Comment on FR Doc # 2010-14488

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General Comment

See attached file(s)

Attachments

IRS-2010-0010-0913.1: Comment on FR Doc # 2010-14488

PENNSYLVANIA CHIROPRACTIC ASSOCIATION

August 16, 2010

Office of Consumer Information and Insurance Oversight
Department of Health and Human Services
Attention: OCIO-9991-IFC
P.O. Box 8016
Baltimore, MD 21244-1850

RE: Interim Final Rule for Group Health Plans and Health Insurance Coverage Relating to Status as a Grandfathered Health Plan under the Patient Protection and Affordable Care Act

The Pennsylvania Chiropractic Association (PCA) represents the interest of over 3,500 licensed Chiropractors and the 20 million people who reside in the commonwealth of Pennsylvania. On behalf of those we represent, we are very concerned with "Grandfather" regulations which will determine whether many of those insured will have access to Chiropractic services under their health care plans. The non-discrimination provision is very important to our patients as it ensures that insurance plans cannot discriminate against providers with respect to participation and coverage if the providers are acting within their scope of practice.

As our country moves forward with the Patient Protection and Affordable Care Act (PPACA), we believe that effective national health care reform will only achieve maximum benefit to the American public when coupled with a broad transformational paradigm shift to a forward thinking and progressive health system that focuses on comprehensive wellness care, healthful lifestyle choices and disease prevention. We believe that such reform is urgent in the face of the looming provider shortage and the unprecedented demands our aging population will place on the system.

All patients should have the right to choose and be reimbursed for all health care services from doctors of Chiropractic without barriers and limitations that unfairly restrict their freedom of choice. Arbitrary anti-competitive barriers only serve to drive up costs, limit patient choice and erode the quality and timeliness of care by steering patients to more expensive hospital, surgical and pharmaceutical care.

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In a properly reoriented health delivery system – one that places an appropriate emphasis on wellness and preventive care – Chiropractic care would rightly be viewed as an essential element of any health plan seeking to provide an adequate range of basic health care services.

Pennsylvania Chiropractic Association
Interim Final Rule for Group Health Plans and Health Insurance Coverage Relating to Status
as a Grandfathered Health Plan under the Patient Protection and Affordable Care Act

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To limit the growth in the cost of health care, it is vital that the Department of Health and Human Services (HHS) encourages the utilization of cost effective health care, such as Chiropractic. Scientific evidence powerfully supports the safety, effectiveness and cost savings of Chiropractic care. Studies published in peer-reviewed scientific journals suggest that Chiropractic care for the treatment of low back and neck pain is likely to achieve equal or better health outcomes at a lower cost than other modes of treatment.

Chiropractic improves clinical outcomes while reducing total spending for common neuromusculoskeletal conditions such as neck and back pain. A number of studies document that lower back pain is one of the most common conditions for which individuals seek professional care. It is estimated that between 40 to 85 percent of people with lower back pain consult health care professionals. According to an article in the Journal of the American Medical Association, lower back pain is the sixth most expensive health condition. It is important that policy makers look to reduce societal costs for treatment of lower back pain by utilizing the particular cost effective expertise that Chiropractic provides.

The PCA strongly recommends that HHS develop strict criteria for obtaining Grandfathered Status to ensure the majority of Americans can benefit from the Non-Discrimination Provision and other important provisions of the PPACA.

Sincerely,



Al Latfonica, DC
President
PCA Board of Directors



Glenn Czulada, DC
Chairman
PCA Summit Relations Task Force