

Essential Health Benefits/Standard Plan Rulemaking Advisory Committee

Summary of Public Comment received as of **May 4, 2017**.

The Essential Health Benefits/Standard Plan Rulemaking Advisory Committee meetings are open to the public. Limited time is available at each meeting to present comments in person. Whether individuals submit comments in person or not, all individuals who wish to submit public comment are strongly encouraged to do so in writing via email to essential.healthbenefits@oregon.gov.

Individual	Organization	Rec'd	Public Comment/Testimony
Vern Saboe, DC	Oregon Chiropractic Association	4/9/15	Dr. Saboe wants the committee to know that many Oregon chiropractors act as primary care providers and provide health care interventions. Dr. Saboe's comments included a list of services that are essential health benefits provided by chiropractors. This list of services included services such as ambulatory, maternity, newborn care, rehabilitative and habilitative, laboratory, preventative care, disease management and pediatric, all of which, according to Dr. Saboe, are within a chiropractor's clinical training and scope of licensure and practice. Dr. Saboe indicates that benefits not included in a chiropractor's scope are emergency services, hospitalization, mental health, substance abuse, and prescription drugs. The comments included two opinions from Legislative Counsel addressed to Representative Kennemer regarding discrimination against provider types in the coverage of essential health benefits and regarding DCBS's proposed guidance relating to provider nondiscrimination.
Natalie Weintraub, LMT	Private Practice	4/09/15	Licensed Massage Therapist, Natalie Weintraub, expressed concerns related to discrimination of massage therapists and to the lack of coverage for massage therapy services. She believes that essential health benefits should include massage therapy. She stated that some insurance companies now consider massage to be a rehabilitative service akin to physical therapy. Ms. Weintraub referenced an American Massage Therapy Association article, which can be found at: https://www.thegrottolibrary.info/Collection/EHB_Final.pdf
P.K. Melethil, MS, L.Ac., Dipl.	Traditional Chinese Medicine Physician	4/09/15	Dr. Melethil's asked the group to consider including acupuncture as part of the 2015 essential health benefits. He stated that over prescription of opioids and other narcotics is a national problem and acupuncture can treat a broad range of health issues, including pain management, neuromuscular syndromes, gastrointestinal disorders, and genitourinary dysfunction. Dr. Melethil referenced ORS 677.757, the definition of acupuncture.
Morgan O'Toole	Kartini Clinic	4/20/2015	Ms. O'Tool asked whether the committee will consider federal and state mandated behavioral health parity will impeded access to these services. She stated that since carriers are allowed to use a third party for these services it could create access issues.
Vern Saboe, DC	Oregon Chiropractic Association	4/20/2015	Dr. Saboe asked the Committee Members and the Oregon Insurance Division remove unlawful references to "Chiropractic Care". He stated that the documents used in

			today's meeting are discriminatory.
Vern Saboe, DC	Oregon Chiropractic Association	4/21/2015- Written and in person	Dr. Saboe provided comment on the Wakely slide number 12. He stated that licensed doctors of chiropractic provide many of the essential health benefits. He stated, to segregate those covered services into a category of chiropractic care with limitations is discrimination based on Section 2706 (a) of the public Health Act. He referenced a seven year prospective study on per member per month comparing cost of chiropractic verses medical management which revealed cost savings. He will provide the committee a copy of the article for reference.
R. Mike Shirtcliff, DMD	Advantage Dental	4/21/2015	Dr. Shirtcliff asked if the State Dental Director can give input on the infectious nature of dental caries with the transmission of the infection from the primary caregiver to child in the child's first 6 months of life.
Dwindy J. Wood	Select Benefit Group Account Specialist	4/21/2015	Mr. Wood requested the committee consider skin cancer screening to be included as preventive care benefits. The cost share deters members from receiving services.