

**From:** Dr. Vern Saboe  
**Sent:** Friday, December 11, 2015 11:08 AM  
**To:** Phil Donovan; WINKEL Karen J \* DCBS  
**Subject:** RE: EHB Proposed Rules, Agenda and FIS worksheet

The Oregon Chiropractic Association also appreciate the language found in (4) and (5) of page 6. And agree with the suggestion to stay consistent with language in (4) and re-write (5) to state -

(4) In the administration of essential health benefits and the EHB base benchmark health benefit plan an insurer may not discriminate against a provider acting within the scope of the provider's license. (Note: No change from draft language)

(5) In the administration of essential health benefits and the EHB base benchmark health benefit plan an insurer may not exclude services provided by a naturopathic or chiropractic physician if the services are otherwise covered under the plan and the naturopathic or chiropractic physician is acting within the scope of the provider's license.

The Oregon Board of Chiropractic Examiners define doctors of chiropractic "primary care physicians" and the great majority of the EHBs are with a chiropractic physician's license and scope to provide.

Sincerely,

-----

Vern Saboe, Jr, DC., DACAN., FICC., DABFP., FACO.  
Director of Governmental Affairs, Oregon Chiropractic Association  
Oregon Delegate, American Chiropractic Association  
Member, State of Oregon Health Evidence Review Commission (HERC)  
HERC Committee for, Evidence-based Guidelines Development and Coverage Guidance  
915 19th Ave SE  
Albany, OR 97322  
Phone: 541-926-3162  
Fax: 541-928-2742  
Cell: 541-231-4528  
e-mail: [vern@drvernsaboe.com](mailto:vern@drvernsaboe.com)  
website: [www.drvernsaboe.com](http://www.drvernsaboe.com)