

November 4, 2021

**ADDENDUM to OCA proposal:**

In response to the WC meeting discussion regarding the proposed increased of Chiropractic Manipulative Therapy (CMT) codes, I would like to provide additional information as I was unable to participate in the November 3<sup>rd</sup> meeting.

The intention of this proposal has been accumulating for years, as the CMT codes have not changed OTHER than with the recent cost of living increases. The cost of living is not the reason for the proposal, however it was specifically brought up to show that last year's increase did not adequately local cover cost of living, therefore the 1.6-1.9% wasn't an acceptable compromise to this proposal.

The purpose of the proposal was to address the discrepancy of the fee schedule between Osteopathic Manipulation Therapy codes and the CMT codes, as well as addressing the lack of increases within the chiropractic profession that the medical community gets to take advantage of nearly every year with the E/M codes. Although chiropractors are allowed to use E/M codes, we are not allowed to use them every visit, and with the caps placed on chiropractic visits, it is likely that only two or three E/M services would be provided and accepted within the 18 visit/60 day chiropractic restriction.

And regarding the argument that this proposal only addresses the CMT codes, and not the other physical medicine codes, that is simply because the CMT codes have been excluded from CMS input and therefore will not change unless a request is provided. All other physical medicine codes will increase (or decrease) with CMS influence.

I apologize for not participating in real time, but I hope this additional information can provide some clarity to this proposal.

Sincerely

Daniel Miller, D.C, P.C.