

From: [REDACTED]
To: [ETF SMB Board Feedback](#)
Subject: Insurance Feedback
Date: Saturday, September 7, 2024 12:54:51 PM

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I am writing to bring to inform you of the importance of including additional coverage for chiropractic health care within UHC's "Routine Chiropractic Services (medically necessary)" provision. Chiropractic care is an integral component of holistic health and wellness, and ensuring its accessibility through insurance coverage is essential for the well-being of individuals seeking these services. The benefits of chiropractic care extend beyond physical well-being, as it can positively impact mental health, enhance mobility, and contribute to a higher quality of life.

The UHC Advantage Plan for "other chiropractic" needs updating. The State of Wisconsin Employee Trust Fund plan's UHC Advantage plan offers unlimited chiropractic visits every year for Medicare Approved" but only for manual vertebral subluxation under Medicare. "Routine Chiropractic Visits" offers a 0 copay and the policy states: "Covered services include routine visits for the treatment of conditions involving nerves, muscles, soft tissue, and bones. Unlimited chiropractic visits every year." Is it only for "Medicare approved" service or what defines the "conditions" noted above?

Under "Additional Benefits, Chiropractic Services" it does not include the State Statute requirement of a yearly examination nor coverage for electronic stimulation before a manual manipulation of the spine.

While coverage for unlimited "manual manipulation" by a chiropractor is a welcome provision, the double-edged sword arises by the Wisconsin Legislature—State Statutes 446.02(7d)1. which requires: "A chiropractor shall evaluate each patient before commencing treatment of the patient to determine whether the patient has a condition that is treatable by the practice of chiropractic. The evaluation shall be based upon an examination that is appropriate to the patient. To conduct the evaluation, the chiropractor shall utilize chiropractic science, as defined by the examining board by rule, and the principles of education and training of the chiropractic profession."

As such it seems that this State of Wisconsin Legislative mandate is a key component to obtaining chiropractic health care and should be included in the UHC Advantage Plan under "Routine Chiropractic Visits."

Additionally, many chiropractors use "electronic manipulation" prior to "manual manipulation" whereby the patient is relaxed and the manual manipulation easily occurs as opposed to the contrary when the chiropractor does not attain a complete adjustment and then requires the patient to return in a day or two for another try. Electronic manipulation is another cost-saving benefit that could be offered in "Routine Chiropractic Visits."

Furthermore, it appears that under the federal transparency rule all covered items, services, and drugs are required to be included in the consumer price transparency tool for plan years that begin on or after January 1, 2024. As such I am writing in an attempt to get better clarification of chiropractic health care before the “It’s Your Choice” rollout in October.

From my perspective, it does not seem to make financial or logical sense to be denied a chiropractor payment for a service (exam) the State Statutes mandate [REDACTED]

Perhaps getting transparency of coverage for a yearly exam, and electronic stimulation included in “Routine Chiropractic Care” will bring some clarity to those that rely on great chiropractic health care under the UHC Advantage plan.

In conclusion, I urge the Board of Insurance to consider the significance of including additional coverage for chiropractic health care within the UHC Advantage insurance policy. Doing so will enable individuals to access these beneficial services without financial strain and promote a comprehensive approach to healthcare. Thank you for your time and attention to this important matter.

Carol Schmidt, [REDACTED]



STATE OF WISCONSIN
Department of Employee Trust Funds
A. John Voelker
SECRETARY

Wisconsin Department
of Employee Trust Funds
PO Box 7931
Madison WI 53707-7931
1-877-533-5020 (toll free)
Fax 608-267-4549
etf.wi.gov

September 30, 2024

Carol Schmidt
[REDACTED]

Dear Carol Schmidt:

Thank you for your September 7, 2024, email to the Group Insurance Board (Board) and the Department of Employee Trust Funds (ETF) regarding your concerns about chiropractic coverage in UnitedHealthcare's (UHC's) It's Your Choice (IYC) Medicare Advantage plan.

Following receipt of your email, we asked UHC for more information. We learned that as of September 20, 2024, all five of your claims for electrical stimulation with a chiropractor (CPT code G0283) that had been denied and appealed have been paid, as the denial was overturned.

As you know, chiropractic coverage is required under Wisconsin state statutes. You assert that coverage for electrical stimulation is mandated under state law. However, the law does not include this specificity. Services that are covered must be medically necessary, and not experimental or investigative. Health plans are given the authority under the contract to make these determinations. They appear in their medical policies. The Board and ETF do not have the medical staff to establish medical policy.

UHC's IYC Medicare Advantage plan offers Uniform Benefits like all plans in the Group Health Insurance Program except for Medicare Plus. UHC informed me that they have updated their coverage language and that if you continue with UHC's IYC Medicare Advantage plan and incur these services, it appears the service will be denied and if you appeal, the denial may be upheld.

We reached out to the health plans that are offered in Brown County for 2025 and found that while Common Ground, Prevea360 and Robin with HealthPartners (Robin) cover electrical stimulation with a chiropractor (CPT code G0283) from an in-network provider, Network Health Plan (Network) finds it experimental or investigative and would not cover it. Network's policy is based upon their research that peer-reviewed evidence doesn't support the use as a standard of care. During open enrollment you may want to consider changing to Common Ground, Prevea360 or Robin for 2025.

Carol Schmidt
September 30, 2024
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I hope you have found this response helpful. If you have additional questions or concerns, please feel free to reach out using the contact information provided below. A copy of your letter and ETF's response will be included in the materials for the November 13, 2024, Board meeting.

Sincerely,

Arlene Larson, Manager of Federal Program and Policy
Office of Strategic Health Policy
Department of Employee Trust Funds
arlene.larson@etf.wi.gov
608-264-6624