



March 20, 2023

Karma Lombard

Maine Bureau of Insurance

34 State House Station

Augusta ME 04333

Re: Clear Choice Comment Submission

Ms. Lombard,

The Maine Chiropractic Association welcomes and appreciates this opportunity to comment on the Clear Choice design programs as we look to 2024 and beyond. We were pleased with testimony and questions suggested during the public meeting.

It is our understanding that a suggestion has been made which we would support, having a new coverage category created for all metal levels. Naming language is to be determined, but best described as “Rehabilitative or Habilitative Therapy” and would encompass physical therapy, occupational therapy, chiropractic care and speech therapy.

In concept, because these services require multiple visits over a period of time, they are not the same as specialty care with its higher copays for a one time visit, thus the suggestion has been made to make the copay for these match that of the Primary Care Copay. It is my understanding that the initial review indicated that doing so would not have significant effect on premiums and benefit structures.

Creating this category also corrects what for many people is a “ghost’ or “shadow” benefit where the large majority if not all the cost is paid by the patient and little or none by the insurer. These rehabilitative services level can also reduce the number of people who cannot afford the current copays and instead wait until the condition becomes worse, often requiring emergency rooms and/or surgical intervention.

In 2019 newly elected Governor Mills signed a compact that now includes 46 states to reduce Opioid usage and included suggestions to promote alternative treatments such as those included in this new category of care. Getting quality care earlier and at a more affordable cost may reduce the number of Mainers on prescription opioids and thus reduce the downstream costs of those addicted to such drugs.

In advance, we thank you for considering the MCA comments as the Bureau seeks to balance patient health benefits and insurance cost of care.

Respectfully,

Robert Reed, Executive Director

Maine Chiropractic Association