



A M E R I C A N
CHIROPRACTIC
ASSOCIATION

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July 6, 2022

Re: Comments Regarding U.S.-Taiwan Initiative on 21st-Century Trade (Docket No. USTR-2022-0005)

The American Chiropractic Association (ACA) appreciates the opportunity to provide comments on the U.S.-Taiwan Initiative on 21st-Century Trade. ACA is the largest professional organization in the United States representing doctors of chiropractic. ACA members lead the chiropractic profession by working with the broader healthcare community to support meaningful research and contribute to the health and well-being of the estimated 35 million Americans who seek chiropractic care each year.

We understand that there is currently no legal recognition for doctors of chiropractic in Taiwan, many of whom are U.S.-trained and licensed. The result, among other things, is a market access and labor issue that we believe should be resolved through your trade initiative, which seeks to deepen trade between the U.S. and Taiwan.

Most developed countries around the world have licensed or regulated the chiropractic profession in a way that allows it to contribute to public health and a strong workforce population; however, sources in Taiwan tell us that healthcare authorities there continue to insist that this is impossible even after years of effort by the Taiwan Chiropractic Doctors Society. As a result, chiropractors in Taiwan are subject to citations and fines for “practicing medicine or physical therapy without license.” This problem poses difficulties for progress within several of the categories you hope to address, including trade facilitation, good regulatory practices, matters related to standards, and other practices that undermine fair market opportunities for U.S. workers and businesses.

We believe the chiropractic industry can make a positive impact to Taiwan-American trade if it receives the proper government support through recognition and regulation. In the United States, doctors of chiropractic (DCs) — which is the professional title granted to them by colleges accredited through an agency under the authority of the U.S. Department of Education are listed as physicians in the federal Medicare program. Their essential services are available in other federal health delivery systems such as Medicaid, the U.S. Departments of Veterans Affairs and Defense, the Federal Employees Health Benefits Program (FEHBP), federal workers’ compensation, and all state workers’ compensation programs. In addition, chiropractors were identified as part of the “essential critical infrastructure workforce” by the U.S. Department of Homeland Security in March 2020, shortly after the outbreak of the COVID-19 pandemic.

DCs are educated and licensed to diagnose, treat, and co-manage patients. They practice an evidence-based non-drug, noninvasive approach to pain relief and health care. In the United States, they work in private practices, multidisciplinary clinics and hospitals. Their services have been critical over the course of the pandemic in managing cases that otherwise may have ended up in emergency



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rooms. From the start of the pandemic, doctors of chiropractic have provided essential care to other healthcare providers (including nurses and medical doctors), first responders, truck drivers, grocery store workers and others who have physically demanding jobs that are critical to supporting America's infrastructure.

A growing body of research supports the effectiveness of chiropractic care, particularly for common musculoskeletal conditions such neck pain and low back pain – which is the single leading cause of disability worldwide. Recent studies also show that patients with back pain who visit a doctor of chiropractic first are less likely to need a prescription for opioid pain medications compared with those who visit a medical doctor first.

We hope this information helps you better understand why the chiropractic profession should be formally recognized in Taiwan. Such a change would open new channels for Taiwanese citizens who would like to travel to the U.S. to study chiropractic and return to their homeland to practice or for the establishment of chiropractic colleges in Taiwan. Likewise, such a change would open new avenues of trade for chiropractic product manufacturers that supply the industry with important resources ranging from chiropractic tables to back braces, foot supports, and other clinical instruments and modalities.

The chiropractic profession worldwide serves its patients and communities in a manner that deserves recognition. If you have questions about the chiropractic profession as you prepare for your negotiations with Taiwan, please feel free to reach out to our staff at communications@acatoday.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michele Maiers', with a stylized flourish at the end.

Michele Maiers, DC, MPH, PhD
President
American Chiropractic Association