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For the Attention of: Office of the United States Trade Representative (USTR)

**Reference: USTR-2022-0005 - Comments regarding the US-Taiwan Initiative
on 21st Century Trade 87 FR 3475**

The International Chiropractors Association (ICA) is a non-governmental organization, professional trade association representing the chiropractic profession in the United States and worldwide. We are founding members of the World Federation of Chiropractic. The ICA was founded in 1926 by the developer of the chiropractic profession, Dr. B.J. Palmer. He served as President until his passing in 1961. The ICA is dedicated to the growth and development of the chiropractic profession based on Dr. Palmer's fundamental belief in the principle and philosophy of chiropractic as a unique, separate, distinct, and drug-less healthcare profession.

The Evidence Supports Chiropractic Care: While chiropractic care has a whole person effect, it is most widely known for its use with individuals experiencing back and neck pain. Low back pain is a common challenge for 12 percent of the global population. It negatively impacts balance. Clinical trials conducted by the U.S. Defense Department to evaluate the influence of chiropractic care on strength, balance, and endurance among active-duty service members with low back pain found a five percent increase in isometric strength, compared to a six percent decrease by the control group.

In the study, balance increased 28 percent in the chiropractic group compared to no change in the control group; and endurance increased 14 percent in the chiropractic group, compared to a decrease of 10 percent in the control group. These statistically significant findings among active-duty service members with low back pain have value when looking at the value of chiropractic in all populations.

Chiropractic care is among the therapies recommended for better pain management by U.S. federal agencies. Doctors of Chiropractic, also called chiropractors, have extensive training. The National Center for Complementary and Integrative Health at the U.S. National Institutes of Health provides:

- To practice in the United States, chiropractors must earn a Doctor of Chiropractic (D.C.) degree, pass the National Board of Chiropractic Examiners exam, and have a state license. Many states also require chiropractors to pass an exam about state-specific laws, and all states require practicing chiropractors to take continuing education classes.



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- To enroll in a D.C. program in the United States, which typically takes 4 years to complete, students must have had at least 3 years of undergraduate education.
- Institutions that award the D.C. degree are accredited by the Council on Chiropractic Education, which is recognized as an accrediting agency by the U.S. Secretary of Education. In 2017, there were fifteen accredited D.C. programs on eighteen campuses in the United States.
- Chiropractic education includes classes in basic sciences, such as anatomy and physiology, and supervised clinical experience in which students learn skills such as spinal assessment, adjustment techniques, and making diagnoses.

A May 20, 2022 article reporting on a study that looked at two million worker's compensation claims in twenty-eight states provided, "...the Workers' Compensation Research Institute found that medical care costs less and claimants return to work more quickly when low back pain treatment is provided solely by chiropractors. Costs were also lower when chiropractors provided physical medicine services, but other types of clinicians were in charge of evaluation and management, but the difference was not as dramatic. "This study will be helpful for policymakers and stakeholders who are interested in re-evaluating the role of chiropractors, especially those who have been adopting evidence-based practices and contributing to cost-effective care," stated WCRI President and Chief Executive Officer John Ruser in a press release.

Forty-Three Million Americans a Year Use Chiropractic: There is a significant and increasing body of peer-reviewed evidence validating the safety and efficacy of chiropractic care, which is increasingly an integral component of health care systems worldwide. In the United States, approximately 13 percent of Americans (forty-three million) visit a chiropractor annually. There are over 74,000 licensed chiropractors in practice in the United States and 105,000 worldwide. Over one million chiropractic adjustments happen each day around the world.

Athletes Rely on Chiropractic: It is widely known that most college athletic departments, and professional sports teams employ Doctors of Chiropractic to provide care to their players to keep them at optimal performance levels. Increasingly, this is the case for high school athletic teams as well. Within the ICA leadership are doctors who provide chiropractic care to Strongman and weightlifting athletes at the highest global levels of competition, to professional golfers in the US Open, and even to professional rodeo riders. Other ICA doctors serve as doctors to professional baseball teams, and other athletes.

The ICA provides this background as a pre-amble to our comments regarding the US-Taiwan Initiative on 21st Century Trade. Chiropractors are regulated in many jurisdictions around the world, including every state and territory of the United States, every province in Canada, in Hong Kong SAR, Macau SAR, Malaysia and Thailand in the Asian region.



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The ICA is aware that there are approximately sixty practicing chiropractors in Taiwan. The Taiwan Chiropractic Doctors Society (TCDS) are our colleges as longstanding members of the WFC. At present, chiropractic does not have legal status in Taiwan. There continue to be heavy penalties for those found guilty of practicing. The current situation in Taiwan is reminiscent of the history of the development of chiropractic in the United States and the primary reason the ICA was originally established. In many states, Doctors of Chiropractic were charged with practicing medicine without a license. The ICA was able to work with state legislators and policy makers to establish the legal framework for chiropractic. It was shown in every U.S. state and territory that the practice of chiropractic is not the practice of medicine, and the solution to the regulatory challenges was the establishment of legal status for the practice of chiropractic with the establishment of scopes of practice in line with the chiropractic education and a regulatory body (Chiropractic Board of Examiners) to oversee the profession in each state. The availability of chiropractic care within Taiwan has much to offer its citizens. The opportunity for U.S. companies to provide chiropractic-related products and to develop relationships in Taiwan to support the chiropractic profession as it develops would be significant.

It is our understanding that most Taiwanese chiropractors have graduated from U.S. chiropractic colleges and thus are trained to a level that qualifies them to safely and competently practice in the United States and elsewhere. It is troubling that there remains a prohibition on the chiropractic profession developing and doctors of chiropractic working without fear of steep penalties in Taiwan.

The 126-year track record of safety far exceeds that of conventional medical approaches. The U.S. experience of safety and benefit in the private sector as well as within the U.S. Veterans Administration and the U.S. military health system, including in Medicare and increasingly in Medicaid, points to the value of chiropractic. Furthermore, soon after the declaration of the COVID-19 pandemic, the Cybersecurity and Infrastructure Security Agency (CISA) under the U.S. Department of Homeland Security found merit in adding chiropractors to the list of Essential Critical Infrastructure Healthcare Workers, recognizing the critical role of chiropractors in their local communities.

There is no discernable justification from a public and patient safety perspective not to promote a positive statutory change in Taiwan. Establishing a legal status for the chiropractic profession in Taiwan will open educational opportunities for students to be recruited by American educational institutions offering chiropractic programs, and, as mentioned above, increased business opportunities for U.S. vendors who will be able to market their chiropractic products in Taiwan.

From all appearances to those in the chiropractic profession outside of Taiwan, it appears there is an unfounded persecution of chiropractors wishing to work in Taiwan. We respectfully call upon the United States Trade Representative to call on the government to review its position and put in place legislation governing the practice of chiropractic such that these health care professionals may deliver the care they are trained to bring to the public.



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The growth of chiropractic in Taiwan is an opportunity whose time has come. We can envision the development of chiropractic colleges in Taiwan, establishing international research projects between the U.S. and Taiwan to study the whole person effect of regular chiropractic care, as well as the ICA's post graduate education councils offering training programs to doctors in Taiwan, and a host of other opportunities between the U.S. and Taiwan.

The ICA and our 501(c)(3) sister organization, the Foundation for the Advancement of Chiropractic Tenets and Science (FACTS) are SAM and UN (and UN subsidiary organizations) registered. We stand ready to assist in the United States Trade Representative and this Initiative as needed. Thank you for your efforts.

Sincerely,

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