

**Comments received for GCR 22-101: [Changes to Prior Authorization Requirements](#)**

I was so pleased to read the Global Commitment Register's proposed Changes to Prior Authorization Requirements. Our chiropractic practice sees many children, including many with musculoskeletal complaints that chiropractic can help with. Having Medicaid coverage for chiropractic for children ages 6-11 will be very helpful for many families. I am credentialed by the Academy Council of Chiropractic Pediatrics (ACCP) and wondered if you could send more information about how I can inform CMS of my certification.

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On behalf of the Vermont Chiropractic Association, I am writing to strongly oppose the proposed changes to Policy 22-101: Prior Authorization Requirements. Specifically, the proposal that an Academy Council of Chiropractic Pediatrics (ACCP) certification is necessary to obtain a waiver to prior authorization for pediatric patients. All licensed chiropractic physicians, regardless of affiliation with ACCP, are adequately trained to examine and treat neuromuscular conditions regardless of the age of the patient.

In addition, regarding the reinstatement of the PA requirement for ACO patients, does Medicaid or the ACO have utilization data for the past two years outlining the difference in utilization for ACO versus non-ACO patients? If so, please provide that data. If not, please put me in touch with the correct person/group/department who would.

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