

Modernizing Delegation of Physical Medicine Services

THE ISSUE

BCBSM policy requires chiropractic physicians to personally perform physical medicine modalities and therapies, rather than allowing appropriately trained personnel to perform eligible services under the chiropractic physician's direction and supervision — a standard more restrictive than Michigan's statutory framework for delegation.

Michigan's Public Health Code, MCL 333.16215, allows a licensee to delegate selected acts, tasks, or functions to a qualified licensed or unlicensed individual, within the licensee's scope of practice and under the licensee's supervision. The law does not permit delegation of functions requiring the same level of education, skill, and judgment as the licensee.

MAC'S ADVOCACY QUESTION: *If Michigan law recognizes appropriate delegation under qualified supervision, why should chiropractic practices be subject to a more restrictive payer policy?*

REQUIRING THE CHIROPRACTOR TO PERSONALLY PERFORM EVERY COMPONENT OF CARE CAN:

- Limit patient access to conservative, non-invasive care
- Delay delivery of treatment plans and increase patient costs
- Reduce practice efficiency and create workflow barriers
- Prevent practices from utilizing trained care-team members

Appropriate delegation does not mean turning clinical decision-making over to someone else. The chiropractor remains responsible for diagnosis, treatment planning, and clinical oversight — the care team helps deliver the treatment plan.

MAC'S POSITION — WHAT WE'VE PROPOSED TO BCBSM

Chiropractic practices should be able to use appropriately trained personnel to provide eligible physical medicine services when those services are ordered by the chiropractic physician, within the individual's education and scope of practice, performed under appropriate supervision, and delivered per established office protocols and patient-safety standards.

Eligible Modalities & Therapies

- Therapeutic exercise & functional activities
- Neuromuscular re-education
- Manual therapy and massage therapy
- Mechanical traction
- Electrical stimulation and ultrasound
- Other appropriate adjunctive, procedure-based therapies

Potentially Eligible Personnel

- Chiropractic Assistants
- Licensed Massage Therapists
- Certified exercise professionals
- Other qualified personnel permitted under Michigan law

Chiropractor Retains Responsibility For:

- Diagnosis, treatment planning & clinical decisions
- Supervision, patient safety & quality of care

NOT A NEW OR UNTESTED MODEL

Delegation is already part of healthcare delivery in other rehabilitation settings. Physical therapists, occupational therapists, and other healthcare professionals routinely work with qualified team members who provide components of a treatment plan under appropriate supervision. Michigan's delegation statute provides a broader framework for appropriately qualified individuals to perform selected functions under a licensee's supervision.

STATUS & NEXT STEPS

MAC brought this concern directly to BCBSM and developed a formal proposal for modernizing the delegation policy. MAC is continuing to work with BCBSM/BCN on this issue and will keep members informed as the discussion develops.

MAC advocacy is an ongoing process. Policy discussions and proposed changes do not necessarily mean that a payer has adopted the requested change.