Senator Lyons, Rep. Houghton, Rep. Cordes and Rep. Stone,

I wanted to thank you for all of your time on Friday! I wanted to summarize my concerns for you.

As a solo practitioner Physical Therapist in Middlebury, the administrative challenge of prior authorizations and limited payments affect me significantly.

As of 01/01/2023, we were informed that there was a new requirement from DVHA, that any VT Medicaid recipient was now allowed 30 visits of COMBINED PT, OT and SLP services per calendar year and that anything over that would need a prior authorization. While thirty visits seems like quite a few, when you recognize both the fact that it is 30 visits between three professions, it is not very many at all.

These authorizations are putting significant strain not only on my practice but also on others in our state. When combined with all of the other administrative burdens and low payment we are faced with, the pressure is suffocating. This especially effects practices like mine, the smaller private practices in our rural areas. It is challenging enough to keep track of PT visits, let alone visits that a patient has had billed through all three disciplines, which are usually provided by three separate business organizations.

In the beginning of last year, when I voiced my concern about this new requirement, I was told by VT Medicaid provider services that there would be an easy way to look up how many visits have been billed for each patient on the portal and that they thought it would be easier for providers. Not only is this insufficient, as this would only be what was billed, not what they have actually received, but there was no way for us to look it up on their system. Even though I have frequent collaboration with the other providers, and have tried to keep up with the number count with the SLP and OTs that I share patients with, this has become an impossible task, and only adds to the administrative burden.

Between the significant amount of time to deal with young children with complex needs, their caregivers, the paperwork needed for the prior authorization for the medically necessary equipment (time which is cannot be billed), limited reimbursement, and now losing money because of a lack of prior-authorizations with the combined visits, I may not be able to take as many complex patients as I have been. Many of these patients also require multiple care coordination meetings throughout each year, which I am expected to attend with no payment for my time or expertise. Our state is losing private practitioners at a high rate as it is, and these prior authorization requirements are making it worse.

I have let my VT Medicaid provider representative know how this has been impacting my practice down here in Addison County and have attached their response. I feel that the response from them is not sufficient. DVHA stated that they "posted the proposed

changes for comments and didn't receive any indicating the changes would be unwelcome". I try to read all of the information that they put out for us to read and I was not aware of this time to give comments, otherwise I definitely would have. Every therapist that I have spoken to about this around the state is also very unhappy about it as it has made our jobs even harder. Many have also voiced their concerns to DVHA.

Vermont is also losing private practices, in part, because of the limited payments for services with no significant increases for more than a decade. This makes it difficult for small private practices to hire enough physical therapy staff to meet the public's needs. Given the challenges with administrative burden and reduced payment, many physical therapists are choosing other professions or to move out of state. The current payment does not cover the cost of care, including the high documentation requirements and care coordination, which is especially true for pediatrics and adults with complex medical needs. This, combined with the requirements of a doctoral degree to be a Physical Therapist now, with significant student loan debt, has become the perfect storm, and it is affecting our patients.

Physical Therapy, along with the other rehabilitation/habilitation services, have a significant value to our society. We can help prevent impairments and minimize disabilities, we can help people manage pain and avoid pain meds or go back to leisure activities which are so good for mental health, and we can help people get back to work when they are out on workmen's compensation.

Our Vermont Physical Therapy services need your help.

If you have any questions or would like more information, please feel free to reach out. I have also given this information to Ruth Hardy.

Thank you for your support of therapy services for our Vermonters.

Heidi Wilhelm DPT

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