

Dear, Madam Chair and Committee Members,

I am writing to express my support for the proposed legislation establishing site-neutral reimbursement for Physical Therapy services. Policies that align reimbursement with the service provided—rather than the setting in which it is delivered—help promote fairness, transparency, and cost efficiency within the healthcare system while maintaining patient access to high-quality rehabilitation care.

Physical Therapists provide evidence-based treatment for musculoskeletal and neurological conditions using standardized CPT coding for services such as therapeutic exercise, neuromuscular reeducation, manual therapy, and therapeutic activities. Ensuring that reimbursement for these services is consistent regardless of whether they are delivered in a hospital outpatient department or a community-based clinic supports both patients and providers while helping to control unnecessary healthcare spending.

While supporting site-neutral reimbursement for Physical Therapy services, it is also important that the legislation include Occupational Therapy and Athletic Training. These professions frequently provide care using many of the same CPT codes and rehabilitation interventions used by Physical Therapists. When providers deliver comparable services using the same billing structure, it is reasonable that reimbursement policies treat those services consistently.

Another important consideration is that within most commercial and government insurance policies, Physical Therapy, Occupational Therapy, and Athletic Training services are grouped together under the same “Physical Medicine” or rehabilitation benefits. Because insurers already categorize these professions together within the same benefit structure, including all three professions within site-neutral billing would ensure that reimbursement policy is aligned with how these services are already defined and administered within insurance plans.

Including Athletic Trainers is also consistent with the legislative intent of Vermont Act 141, which was enacted to ensure reimbursement for Athletic Training services in a non-discriminatory manner when compared with other professions providing similar care. Athletic Trainers are licensed healthcare professionals who deliver musculoskeletal evaluation, rehabilitation, and injury prevention services. Including them within this legislation would align the bill with the policy goals established under Act 141.

For these reasons, I strongly support the establishment of site-neutral reimbursement for Physical Therapy services and respectfully encourage the inclusion of Occupational Therapy and Athletic Training within the bill so that all rehabilitation professionals providing comparable care—and already grouped within the same Physical Medicine benefits—are treated consistently.

Thank you for your consideration of this important issue.

Sincerely,  
Michael Landsberg, ATC, CSCS