

September 27, 2017, 3:15 P.M. EST

Seema Verma, MPH
Administrator
Centers for Medicare & Medicaid Services,
Department of Health & Human Services
Attention: CMS-1715-P
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: CY 2020 Revisions to Payment Policies under the Physician Fee Schedule and Other Changes to Part B Payment Policies

Dear Seema,

The purpose of this package and letter is to provide a response to the proposed 8% cut to Physical Therapy and Occupational Therapy in the Physician Fee Schedule for 2021.

First, I confess to a strong bias towards conservative care - as I am a Physical Therapist and an employer of Physical Therapists.

Having said that, here's what I hope is a unique perspective for you to consider:

1. Physical Therapy and Occupational Therapy offer the best outcomes in healthcare for the dollar.

We help people in pain get back to normal naturally.

Looking at the Healthcare GDP numbers for Healthcare (using the latest numbers available in 2017), the total US Healthcare GDP is \$3.5 Trillion.

Of which 53% goes to Physician Care, Clinical Care and Hospital Care. 10% goes to Prescription Drugs.

Physical Therapy, Occupational Therapy and Speech Therapy combined? 2.6%.

We are the low cost provider.

I've included 255 hand-written testimonials with permission of Medicare subscribers we have had the privilege to help at our main Physical Therapy office in Traverse City, MI.

The purpose of this is for you to see for yourself the outcomes we are producing and the lives we are changing.

2. This is the 4th reduction to Physical Therapy Medicare reimbursements in the past 24 months.

Three have passed.

I'm aware the APTA letter(s) have outlined this for you.

In addition to being a Physical Therapy practice owner, I also have the unique vantage point of working with 40+ Private Practice Physical Therapy owners in 14 other states.

I can tell you from firsthand knowledge, many of these practices are struggling financially as it is with a national average profit margin of just 4%.

Most see Medicare beneficiaries. Many are more than 50% Medicare Part B. A handful are serving nearly 100% Medicare Part B.

With profit margins frequently hovering less than 10%, some businesses will have to close their doors if this Proposed Reduction goes through.

That leads to a significant decrease in accessibility to care.

I am sure this is not the intention of the proposal.

3. We have an Opioid Crisis NOT a Physical Therapy Crisis.

From both the CMS reports and the US Healthcare GDP reports, we can see where the money goes in healthcare.

Physical Therapy and Occupational Therapy look to be \$2.8 Billion of the \$109 Billion distributed by Medicare.

The total distributions for medications, injections and surgery are significantly higher.

In the present state of the US, where the Healthcare expenditure works out to \$10,739 per year per individual (utilizing the 2017 reports), why would we decrease money to conservative care?

The healthcare expenditure is double that of any other country in the world.

One would think we would be the healthiest country in the world.

Yet we are far from it.

When we look at where the money is distributed, it is in medications, injections and surgeries.

I'm curious to understand how reducing distributions to Physical Therapy and Occupational Therapy can help improve the health of our country and ultimately lead to lower healthcare costs.

I doubt there is a single person who could justify that logic.

Physical Therapy and Occupational Therapy directly help decrease the need for medications, injections, surgery and other healthcare related expenses.

I appreciate your time, thoughtfulness and consideration in this matter.

Cordially,

Andrew Gorecki, DPT
Physical Therapist
Superior Physical Therapy
231.649.2015