



September 4, 2020

Demetrios Kouzoukas
Principal Deputy Administrator for Medicare and Director
Center for Medicare
CMS
7500 Security Boulevard
Baltimore, MD 21244

Elizabeth Richter
Deputy Director
Center for Medicare
CMS
7500 Security Boulevard
Baltimore, MD 21244

Dear Principal Deputy Administrator Kouzoukas and Deputy Director Richter:

On behalf of American Occupational Therapy Association, American Physical Therapy Association, and American Speech-Language Hearing-Association, we look forward to an opportunity to meet with you and your colleagues to discuss the 2021 Medicare Physician Fee Schedule proposed rule. Specifically, we would like to share with you our concerns regarding the estimated -7% to -9% payment reductions to services furnished by occupational therapy practitioners, physical therapy practitioners, speech-language pathologists, and audiologists. During the meeting, AOTA, APTA, and ASHA will share our recommendations on how the impact of the cuts can be mitigated on our members and the Medicare beneficiaries they serve. These cuts will place additional pressure on the entire health care system and the clinicians who are working tirelessly to fight the pandemic and support those individuals recovering from COVID-19.

We recognize that federal law requires budget neutrality; however, stakeholders have provided numerous recommendations to partially mitigate the negative impact of these reductions and we remain concerned that CMS has not utilized its full authority to pursue these regulatory options. Applying budget neutrality should be done in a manner that ensures ongoing access to vital therapy and audiology services.

If the payment cuts are implemented as proposed, occupational therapy, physical therapy, speech-language pathology, and audiology providers, many of whom are small business owners, will become financially incapable of maintaining their businesses and beneficiary access to medically necessary care will be threatened.

AOTA, APTA, and ASHA have requested a meeting with you and your colleagues to discuss CMS' proposed application of budget neutrality as outlined in the 2021 PFS proposed rule and again offer recommendations on how CMS may advance its policy goals without harming enrolled health care professionals and the Medicare beneficiaries they serve. Our organizations stand ready to work with CMS to develop a policy that will safeguard the financial health of the Medicare program while ensuring that patients have adequate access to high-quality services in the outpatient setting.

Thank you for your consideration.

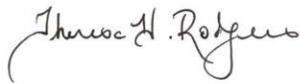
Sincerely,

A handwritten signature in black ink that reads 'Wendy Hildenbrand'.

Wendy C. Hildenbrand, PhD, MPH, OTR/L, FAOTA
AOTA President



Sharon L. Dunn, PT, PhD
Board-Certified Clinical Specialist in Orthopaedic Physical Therapy
APTA President



Theresa H. Rodgers, MA, CCC-SLP
2020 ASHA President

cc:

Ing-Jye Cheng, Acting, Director, Hospital and Ambulatory Group

Ryan Howe, Deputy Director, Hospital and Ambulatory Group

Gift Tee, Director, Division of Practitioner Services, Hospital and Ambulatory Group

Marge Watchorn, Deputy Director, Division of Practitioner Services, Hospital and Ambulatory Group