

HOW TO SUBMIT YOUR LETTER:

We suggest you submit comments *electronically*. You may submit electronic comments on the proposed rule here: https://www.regulations.gov/comment?D=DOD_FRDOC_0001-4511
Copy and paste your **introductory paragraph** into the comment box and attach this document as a file, which you can do below the comment box.

**** REMINDER: DELETE THESE SUBMISSION INSTRUCTIONS PRIOR TO SUBMITTING YOUR COMMENTS**

[MONTH & DAY], 2019

Patrick Shanahan
Acting Secretary
Department of Defense
Attn.: RIN 0720-AB72
1400 Defense Pentagon
Washington, DC 20301

Submitted electronically

RE: TRICARE; Addition of Physical Therapy Assistants and Occupational Therapy Assistants as TRICARE-Authorized Providers [RIN 0720-AB72]

Dear Secretary Mattis:

I am writing in response to the request for comments on the Department of Defense (DoD) Office of the Secretary's proposed rule, TRICARE; Addition of Physical Therapy Assistants and Occupational Therapy Assistants as TRICARE-Authorized Providers.

[INSERT A PARAGRAPH ABOUT YOURSELF, THE PHYSICAL THERAPIST SERVICES YOU PROVIDE, YOUR PRACTICE SETTING, AND THE PATIENTS YOU SERVE; OR YOUR STATUS AS A STUDENT AND AMBITIONS AFTER GRADUATION]

As a [PHYSICAL THERAPIST/PHYSICAL THERAPIST ASSISTANT/PHYSICAL THERAPY STUDENT], I appreciate the opportunity to provide feedback to DoD on the proposed rule. I respectfully request that you consider my more detailed comments and recommendations provided below.

Add licensed or certified physical therapist assistants as TRICARE-authorized providers

I strongly support the DoD's proposal to add licensed or certified physical therapist assistants (PTAs) as TRICARE-authorized providers, operating under the same qualifications established by Medicare (42 Code of Federal Regulations (CFR) §484.4). Services must be furnished under the supervision of and billed by a licensed TRICARE-authorized physical therapist.

Qualifications

I support DoD's proposal to tie the qualifications of PTAs under the TRICARE program to Medicare's requirements as codified at 42 CFR §484.4.

Supervision

I agree with DoD's proposal to match TRICARE's supervision requirements to Medicare's.

Reimbursement Requirements

I support DoD's proposal to follow Medicare's requirements as found within Medicare Benefit Policy Manual Chapter 15 and other guidance regarding reimbursement of services provided by PTAs.

Although I support the intent of the proposed rule, I identified two errors within the language of the proposed rule and recommend DoD make the following revisions in final rulemaking:

*Codify the term "physical **therapist** assistant" at 32 CFR §199.6*

DoD references "physical therapy assistants" throughout the proposed rule. The term physical therapy assistant is not accurate; rather the correct term is physical therapist assistant (PTA). The term physical therapist assistant is referenced in 42 CFR §484.115; as such, I strongly encourage DoD to codify the term **physical therapist assistant (PTA)** at 32 CFR §199.6.

*Eliminate reference to **certified** physical therapists in final rulemaking*

DoD references in the proposed rule that PTAs may provide physical therapy services when supervised and billed "under a licensed or certified TRICARE-authorized physical therapist." After graduation from an accredited physical therapist program, physical therapists must pass a state-administered national licensure examination. Physical therapists are licensed in all jurisdictions. Further, within 32 CFR §199(K)(2)(i), DoD uses the term "licensed registered physical therapist." Therefore, I recommend the DoD eliminate any reference to "certified" physical therapists in final rulemaking.

Finally, to increase access to physical therapy services and enhance beneficiary choice in provider selection, I strongly encourage DoD to promulgate the final rule as soon as possible.

Conclusion

Thank you for the opportunity to comment on the Addition of Physical Therapy Assistants and Occupational Therapy Assistants as TRICARE-Authorized Providers proposed rule.

Sincerely,

[NAME]

[TITLE]