

March 27, 2020

Raymond G. Farmer  
NAIC President  
Director  
South Carolina Department of Insurance  
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Michael F. Consedine  
Chief Executive Officer, NAIC  
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Dear President Farmer and CEO Consedine:

On behalf of our more than 100,000 member physical therapists, physical therapist assistants, and students of physical therapy, the American Physical Therapy Association appreciates the work of the National Association of Insurance Commissioners to date to combat the spread of COVID-19. The coronavirus pandemic demands that health care policy makers, payers, and providers reconsider how care is delivered to reduce the risk of further spreading infection. With intensifying concerns surrounding the COVID-19 pandemic, access to telehealth has become of paramount importance to ensure the safety of patients and their providers. APTA encourages NAIC to take immediate steps to ensure patient safety and protect health care providers by issuing guidance to your members on how they can increase access to telehealth services furnished by physical therapists and physical therapist assistants.

It is critical that patients have the ability to receive care at home to avoid placing themselves at greater risk of the virus. Patients should not be forced to choose between compromising their health by forgoing care or compromising their health by exposing themselves to unnecessary risk of COVID-19. In his March 24, 2020, letter to governors, U.S. Department of Health and Humans Services Secretary Alex Azar requested immediate action to increase health care providers' ability to combat the crisis. His first two recommendations were to increase the ability of health care providers to practice telehealth. All providers, including physical therapists and physical therapist assistants, should be granted the increased authority Secretary Azar recommends, especially considering that the delivery of physical therapist services via telehealth has been proven to be safe, effective, and widely implemented in various health care systems. While we must address the crisis, we must also ensure the continued delivery of health care unrelated to COVID-19. Therapy interventions, accessed early and without administrative

barriers, are safe and decrease downstream health care resource utilization.<sup>1</sup> **However, commercial health insurers are preventing physical therapists and physical therapist assistants from practicing telehealth, and thereby putting the health of their patients at risk.** We have heard from our members that many of the major insurance carriers are refusing to authorize and reimburse telehealth services, *even when mandated by the state's emergency orders*. We have also seen that some states have not mandated coverage to telehealth services during the public health emergency, or have only mandated telehealth when used by certain providers.

**We strongly encourage NAIC to issue guidance to its members alerting them to the failure of insurers to follow state orders and encouraging them to mandate access to these critical telehealth services during the COVID-19 pandemic.** APTA stands ready to assist you in any way to meet this goal, including providing examples of successful physical therapist telehealth coverage and payment policies, and information and expertise regarding patient safety and privacy.

Examples of physical therapists using telehealth technologies include the following:

- Physical therapists use telehealth to provide quicker screening, assessment, and referrals that improve care coordination.
- Physical therapists provide interventions using telehealth by observing how patients move and perform exercises and activities. Physical therapists then provide verbal and visual instructions and cues to modify how patients perform various activities. They also may change the environment to encourage more optimal outcomes.
- Physical therapists provide consultative services by working with other physical therapists, physical therapist assistants, and other health care providers to share expertise in specific movement-related activities to optimize the patient's participation.
- Physical therapists use telehealth for quick check-ins with established patients, for which a full in-person visit may not be necessary.

[APTA has compiled research studies on telehealth](#) and testimonials from APTA members on how [they have balanced in-person and telehealth visits](#).

Physical therapists often describe telehealth as a “game changer” that provides access to their services in remote, particularly rural, areas. Telehealth improves access to physical therapy for patients who have mobility issues. Telehealth is also a great way to get specialists and sub-specialists into communities that would otherwise lack access. Telehealth has been shown to improve access to care for rural populations, as well as outcomes for a variety of health problems, including PTSD, chronic pain, stroke recovery, and joint replacement.

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<sup>1</sup> Three studies: Kazis LE, et al. “Observational retrospective study of the association of initial healthcare provider for new-onset low back pain with early and long-term opioid use.” *BMJ Open*. September 20, 2019. <https://bmjopen.bmj.com/>. Sun E, et al. “Association of Early Physical Therapy With Long-term Opioid Use Among Opioid-Naive Patients With Musculoskeletal Pain.” *JAMA Network Open*. December 14, 2018. <https://jamanetwork.com/>. Garrity B, et al. “Unrestricted Direct Access to Physical Therapist Services Is Associated With Lower Health Care Utilization and Costs in Patients With New-Onset Low Back Pain.” *Phys Ther*. 2019 Oct 30. <https://www.ncbi.nlm.nih.gov/pubmed/31665461>.

The Department of Veterans Affairs has shown numerous successful outcomes for telehealth, improving access to medical specialists for veterans who visit community outpatient clinics far removed from the nearest VA Medical Center. The VA found telehealth yielded significant per-patient cost savings over traditional methods of care delivery.<sup>2</sup> Improved outcomes can lead to long-term cost savings. Proper application of telerehabilitation can have a dramatic impact on improving care, by reducing negative consequences and costs of care, and ensuring access to specialized care in geographic areas that face difficulties in maintaining and staffing full-service hospitals.

While rehabilitative services furnished via telehealth would not replace traditional clinical care, telehealth would be a valuable resource for physical therapists and physical therapist assistants in expanding their reach to meet the needs of patients when and where those needs arise, particularly in light of the COVID-19 pandemic. If you would like additional information, please contact Kara Gainer, director of regulatory affairs, at [karagainer@apta.org](mailto:karagainer@apta.org).

Sincerely,



Sharon L. Dunn, PT, PhD  
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President

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<sup>2</sup> [https://www.research.va.gov/topics/healthcare\\_delivery.cfm](https://www.research.va.gov/topics/healthcare_delivery.cfm)