



Dear Director of CMS,

The recently released Medicare Physician Fee Schedule (Proposed Rule, CMS-1734-P) calls for a payment cut for healthcare specialties, specifically occupational therapy (OT). Occupational therapy is facing around a 9% decrease in Medicare Part B reimbursement. This will negatively affect the profession and the ability for our clients to access care.

Occupational therapists work in a variety of settings and help decrease overall healthcare costs. Research shows that patients who receive occupational therapy while in the hospital increase their independence at discharge.¹ Additionally, occupational therapy is the only discipline that was associated with lower readmission rates.² Occupational therapy can save health care costs by helping patients be more independent and decrease the likelihood that they will be readmitted to the hospital.

OT has seen a decrease in reimbursement in recent years due to different funding changes. This has increased layoffs of occupational therapy practitioners and decreased the use of OTs. The strain of COVID-19 on health care has also caused OTs to be furloughed and/or lose their jobs.

The reductions by new Medicare payment policies for office and outpatient visits (E/M codes) that CMS intends to implement on January 1, 2021 will further strain a health care system that is already stressed by the COVID-19 pandemic.

As a state organization, we are asking you to consider waiving the proposed E/M code policies slated for implementation on January 1, 2021. This will give the health care system time to recover from COVID-19 and give our patients the care they deserve.

Sincerely,

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President, Wisconsin Occupational Therapy Association

1. Landi F, Cesari M, Onder G, Tafani A, Zamboni V, Cocchi A, *Effects of an Occupational Therapy Program on Functional Outcomes in Older Stroke Patients*. (Gerontology, 2006)
2. Rogers AT, Bai G, Lavin RA, Anderson GF, *Higher Hospital Spending on Occupational Therapy Is Associated With Lower Readmission Rates*. (Medical Care Research and Review. 2017)