

JGAC Briefing Memo

October 2025



Federal Agencies

- **2026 Medicare Physician Fee Schedule Comments Submitted:** On September 12, 2025, APTA submitted comments on the 2026 Medicare Physician Fee Schedule. APTA consulted with AOTA, ASHA, ADVION, NARA, and numerous members during the comment period. Notable comment areas included payment and code valuation, telehealth, PT's role in chronic disease management, and the Quality Payment Program.
- **Department of Education:** APTA signed on to a letter drafted by the Council of Parent Attorneys and Advocates (COPAA) and the Council of Administrators of Special Education (CASE) urging the Secretary of the Department of Education maintain all current grants under Part D of the Individuals with Disabilities Education Act.
- **Federal Healthcare Advisory Committee Nomination:** APTA nominated Christopher Bise, PT, DPT, PhD, OCS to the newly established Healthcare Advisory Committee that will advise HHS and CMS on strategies and policies to improve federally administered health care insurance and payment programs. The CMS Administrator will appoint 15 individuals with practical and tactical experience and expertise working in all aspects of the US health care system to the Committee and expects to notify those who submitted nominations by the end of October.
- **CMS Innovation Center: APTA met with the CMS Innovation Center Chief Strategy Officer and team on September 11th** regarding APTA's value-based care model on managing frailty. The Center team actively engaged with APTA in discussion focused on how the model aligns with its new priorities.

Commercial Payers

- **CIGNA:** CIGNA will implement a site of care review policy for outpatient physical therapy (PT) services. Effective October 1, 2025, American Specialty Health (ASH), Cigna's Third Party Administrator (TPA) will begin managing the medical necessity review of outpatient hospital sites of care for Cigna providers who render PT services for

patients with Cigna's commercial plans and Individual & Family Plans. Medical necessity review will ensure coverage is received at an appropriate site of care, such as at a freestanding PT facility (when available), unless an outpatient hospital setting is medically necessary.

APTA has requested a meeting with CIGNA and ASH to clarify the policy and to ask for reconsideration.

- CIGNA policy:
https://static.cigna.com/assets/chcp/pdf/coveragePolicies/medical/mm_0600_coveragepositioncriteria_physical_occupational_soc.pdf
- ASH: <https://siteofcare.ashlink.com/cigna>

- **Out-of-Network Repricing Litigation:** APTA and APTA Private Practice have signed on as a plaintiff in multidistrict litigation against Multiplan and major commercial payers that engage MultiPlan to reprice and significantly undervalue payments for out-of-network services. APTA seeks an injunction to put an end to the anticompetitive scheme. The law firms leading the litigation represent APTA at no charge. The firms will also represent members who wish to seek remedy for their underpayments on a contingency basis and will retain a lower % of damages recovered given APTA's involvement. Communications include joint statement with APTA Private Practice, all-member email, and webinar with counsel. This follows a repricing alert practice advisory issued on July 31, 2025. **Save the Date:** Informational webinar for APTA members with the attorneys appointed to the litigation will be on Tuesday, October 28 11:00 am – 12:00 noon (details on registering will be forthcoming)

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U.S. Congress

- **PT Workforce Legislation Reintroduced:** On September 30, 2025, Reps. Morgan Griffith (R-VA) and Diana DeGette (D-CO) reintroduced the Physical Therapist Workforce and Patient Access Act. This APTA-endorsed legislation would add physical therapists to the National Health Service Corp Loan Repayment Program which provides limited loan repayment to certain medical providers who complete a 2-year service commitment at an approved site located in a federally designated rural or medically underserved area. The legislation also provides federal community health centers (CHCs) with option to allow physical therapists to independently bill for their services in CHCs.

APTA Articles of Interest

- [APTA Flash Action Strategy 2025: 8,500 Falls Prevention Letters Sent to Congress | APTA](#)

- [News | Physical Therapist Workforce Legislation Introduced in the U.S. House | APTA](#)
- [Shutdown FAQs: Impact on Federal Payors, Health Care Practices, and Telehealth | APTA](#)
- [News | APTA and APTA Private Practice Join Lawsuit Over Health Care Price-Fixing | APTA](#)
- [News | APTA Advocacy Win: Anthem Changes Payment Policy to Document Total Time per Code | APTA](#)
- [APTA Submits Member Nomination to New Committee Advising HHS Secretary | APTA](#)
- [Article | Advancing the Role of PTs in Falls Prevention Together: From Congress to Clinics | APTA](#)
- [The Clock Is Ticking for Congress to Extend Medicare Telehealth Waivers | APTA](#)