

# FAL Briefing Memo

October 2025



## Federal Agencies.

- **Department of Education IDEA:** On September 22, 2025 APTA joined in a [letter](#) drafted led 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 to maintain all current grants under Part D of the Individuals with Disabilities Education Act.

On October 22, 2025, APTA joined with over 400 provider and patient groups in a joint statement expressing opposition to the U.S. Department of Education’s recent Reduction in Force (RIF). The RIF so far has resulted in the elimination of more than half of the positions at the Department of Education, including nearly all positions in the Office of Special Education and Rehabilitative Services, which includes the Office of Special Education Programs and the Rehabilitation Services Administration. These actions have conflict with specific requirements under the Individuals with Disabilities Education Act (IDEA) and the Rehabilitation Act. Finally on October 23, 2025, APTA joined with over 60 patient and provider organizations in a letter to the Senate Health, Education, Labor and Pensions Committee (HELP) with a request that the committee conduct an oversight hearing on the Reduction in Force (RIF) actions to the Department of Education.

- **Department of Education Federal Student Loans:** The Department of Education’s [Reimagining and Improving Student Education \(RISE\) Committee](#) has begun discussions surrounding the definition of a “professional degree” versus “graduate degree” as it relates to federal student loan borrowing caps. This fall, the Department’s Reimagining and Improving Student Education (RISE) Committee is undergoing a negotiated rulemaking process aimed at clarifying which academic degrees should be classified as “professional degrees” versus “graduate degrees.” Under current federal statute, only a limited number of degree programs—such as medicine and dentistry—are explicitly designated as professional degrees. Many others, including physical therapy, occupational therapy, and speech-language pathology, are not explicitly listed in statute. However, the statute allows the Department to recognize additional degree programs not explicitly listed.

Although physical therapy is not explicitly named in federal statute, it has historically been treated as a professional degree. The current rulemaking process will determine whether any degrees – if any - should be formally added to the professional degree category through rulemaking by the Department. The proposed rulemaking by the Department of Education carries implications for federal student loan eligibility for dozens of non-physician health care providers. If the Doctor of Physical Therapy degree is recognized as a professional degree, students may borrow up to \$50,000 annually, with a lifetime cap of \$200,000. If not, borrowing is limited to \$20,500 per year, with a lifetime cap of \$100,000.

APTA is collaborating with other affected health care provider groups and coalitions, including the Federation of Associations of Schools of the Health Professions (FASHP). As part of the rulemaking process, APTA recently submitted formal comments to the Department of Education advocating for the recognition of physical therapy as a professional degree. APTA also joined a health care provider coalition letter to the Department, while FASHP submitted an additional comment letter requesting a meeting with Department staff. The RISE Committee concluded its first week of negotiations last week. The committee's next session is scheduled for November 3–7, 2025. The negotiated rulemaking process is expected to result in a proposed rule that will explicitly list which professions qualify as professional degrees. Once published, the proposed rule will be subject to a public comment period before a final rule is adopted by the Department. While the Department has indicated a goal of publishing the proposed rule by the end of 2025, that timeline may shift into 2026.

- **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 11, 2025, 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

- **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. An informational webinar discussing opportunities for therapists to sue on an individual basis will be held on Tuesday, October 28 from 11:00 am -12:00 noon EST with the lawyers appointed in the litigation for individual, direct action plaintiffs. All interested members should register for the webinar [HERE](#).

## 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 (H.R. 5621). 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.
- **Home Health:** The Home Health Stabilization Act (H.R. 5142) has been introduced in the U.S. House of Representatives. This bipartisan legislation would prevent impending cuts to home health care under Medicare by requiring the Secretary of Health and Human Services to issue a special rule for calendar years 2026 and 2027, providing a positive payment adjustment to the Medicare home health payment system. The proposed Medicare Home Health rule for 2026 includes a 9% cut to the home health fee-for-service payment rate, threatening access to essential home health services. H.R. 5142 would prevent these cuts and give the Centers for Medicare & Medicaid Services more time to address the issues with the Patient Driven Groupings Model.

## APTA Articles of Interest

- [Shutdown FAQs: Impact on Federal Payors, Health Care Practices, and Telehealth | APTA](#)
- [FTC Drops Legal Appeals, Abandons Noncompete Rule | APTA](#)
- [APTA Advocacy Leads to Noridian Updated Guidance on Plan of Care Signature | APTA](#)
- [Cigna Implements Outpatient Hospital Physical Therapy Site-of-Care Review | APTA](#)
- [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](#)
- [News | APTA and APTA Private Practice Join Lawsuit Over Health Care Price-Fixing | APTA](#)
- [APTA and APTA Private Practice Statement on Joining Federal Antitrust Lawsuit | 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](#)