

# JGAC Briefing Memo

November 2025



## Federal Agencies.

- **2026 Medicare Physician Fee Schedule Final Rule:** On Oct 31, 2026, the U.S. Centers for Medicare and Medicaid Services released the [2026 Medicare physician fee schedule final rule](#). The final rule features a 3.26% increase to the conversion factor, new RTM codes, permanent access to telehealth codes, among other changes. On Nov. 19 at 2:30 p.m. ET, [APTA's Regulatory, Legislative, and Payment Updates webinar](#) will feature APTA staff experts discussing all changes in the fee schedule relevant to physical therapy.
- **Joint Statement on Department of Education:** On October 22, 2025, APTA and APTA Pediatrics 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 the 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. Read the Joint Statement [HERE](#).
- **Department of Education Federal Student Loans:** On November 6, 2026, the U.S. Department of Education's [Reimagining and Improving Student Education \(RISE\) Committee](#) concluded their negotiated rulemaking discussion related to student loans and adopted a proposed definition for what constitutes a "professional degree." Unfortunately the committee chose to adopt a very narrow definition that mirrors the current definition found in federal statute that is limited to only the following fields: Pharmacy (PharmD), Dentistry (DDS or DMD), Veterinary Medicine (DVM) Chiropractic (DC or DCM), Law (LLB or JD), Medicine (MD), Optometry (OD), Podiatry (DPM, DP or Pod D), Theology (MDiv or MHL) and Clinical Psychology (PsyD).

The proposed definition carries implications for federal student loan eligibility for dozens of non-physician health care providers, including students of physical therapy. If this proposed definition is eventually adopted via official rulemaking by the Department

of Education, borrowing for federal student loans will be limited to \$20,500 per year, with a lifetime cap of \$100,000.

APTA has been actively advocating for the inclusion of physical therapy in the professional degree category. APTA has been collaborating with other affected health care provider groups and coalitions, including the Federation of Associations of Schools of the Health Professions (FASHP) and the Patients Access to Responsible Care Alliance (PARCA), both of which APTA is a member. Below are links to the various comment letters APTA submitted to the Department of Education on this issue:

- APTA comment letter to RISE Committee: Click [HERE](#)
- Provider Coalition letter to RISE: Click [HERE](#)
- FASHP Coalition letter: Click [HERE](#)
- PARCA Coalition: Click [HERE](#)

The negotiated rulemaking process is expected to result in a proposed rule from the Department of Education in early 2026. Once the proposed rule is published in 2026, it will be subject to a public comment period before a final rule is adopted by the Department. APTA will alert members when the Department of Education publishes the proposed rule in 2026; APTA will provide details on how individuals can submit comments to the Department of Education via the APTA Regulatory Action Center. In the interim, the provider coalition which APTA is also engaging members of the U.S. Congress to seek their intervention as the proposed definition runs contrary to the intent of Congress.

## Commercial Payers

- **Admin Burden Report:** APTA's [The Impact of Administrative Burden on Physical Therapist Services](#) Report and Infographic was released on November 12, 2025. The report and infographic outline the ongoing and increasingly complex challenges administrative burden creates for clinicians and patients. The central call to action urges payers, regulators, and policymakers to eliminate unnecessary barriers that restrict access to PT services and describes current APTA legislative efforts on the topic.
- **Aetna's Policy Improvements for Physical Therapists** – APTA advocacy efforts led to improvements in Aetna's [coverage policy bulletin](#) updated October 29, 2025. The bulletin now has a more comprehensive and accurate description of the practice of physical therapy and references telehealth platforms as a way to facilitate physical therapy. Aetna also removed the requirement that patients be homebound in order to access home-based PT services. This significant win follows Aetna updating its policy to

provide for unrestricted direct access to physical therapy this summer in response to APTA advocacy. It also included an expanded definition of gait training and more thorough and accurate definition of neuromuscular reeducation and therapeutic exercise.

- **MultiPlan Litigation Webinar:** On October 28, 2028, APTA hosted a members-only webinar, [Navigating the MultiPlan Litigation: What APTA Members Need to Know](#). Members learned more about the case including how it fits into the fight for fair payment practices and affected members can sue for damages on an individual basis from attorneys appointed to represent individual direct-action plaintiffs. These are the same attorneys who represent APTA and APTA Private Practice in the litigation.

## U.S. Congress

- **Disability and Rehabilitation Research Funding:** On October 29, 2025, APTA, alongside other members of the Disability and Rehabilitation Research Coalition, wrote [a letter to House and Senate Appropriations Committee on L-HHS](#) expressing concerns with the sustainability of funding and staffing for critical disability and rehabilitation research programs across the federal government. DRRC urged the appropriators to fully fund these programs in the FY 2026 L-HHS appropriations bill as soon as possible.
- **Senate Oversight Hearing:** On October 23, 2025, APTA and APTA Pediatrics 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.
- **Home Health:** The Home Health Stabilization Act (H.R. 5142) has been introduced in the U.S. House of Representatives. This 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

- [News | Aetna Updates Policy to Better Align With PT Practice and CPT Code Definitions | APTA](#)
- [PTA Win: TRICARE Manual Reflects Change From Direct Supervision to General | APTA](#)
- [Cigna Implements Outpatient Hospital Physical Therapy Site-of-Care Review | APTA](#)
- [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](#)