

## **HOW TO SUBMIT YOUR LETTER:**

We suggest you submit comments *electronically*. You may submit electronic comments on the proposed rule here: [https://www.regulations.gov/comment?D=DOD\\_FRDOC\\_0001-4511](https://www.regulations.gov/comment?D=DOD_FRDOC_0001-4511)  
Copy and paste your **introductory paragraph** into the comment box and attach this document as a file, which you can do below the comment box.

## **\*\* REMINDER: DELETE THESE SUBMISSION INSTRUCTIONS PRIOR TO SUBMITTING YOUR COMMENTS**

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[MONTH & DAY], 2019

Patrick Shanahan  
Acting Secretary  
Department of Defense  
Attn.: RIN 0720-AB72  
1400 Defense Pentagon  
Washington, DC 20301

*Submitted electronically*

**RE: TRICARE; Addition of Physical Therapy Assistants and Occupational Therapy Assistants as TRICARE-Authorized Providers [RIN 0720-AB72]**

Dear Secretary Mattis:

I am writing in response to the request for comments on the Department of Defense (DoD) Office of the Secretary's proposed rule, TRICARE; Addition of Physical Therapy Assistants and Occupational Therapy Assistants as TRICARE-Authorized Providers.

[INSERT A PARAGRAPH ABOUT YOURSELF, THE PHYSICAL THERAPIST SERVICES YOU PROVIDE, YOUR PRACTICE SETTING, AND THE PATIENTS YOU SERVE; OR YOUR STATUS AS A STUDENT AND AMBITIONS AFTER GRADUATION]

As a [PHYSICAL THERAPIST/PHYSICAL THERAPIST ASSISTANT/PHYSICAL THERAPY STUDENT], I appreciate the opportunity to provide feedback to DoD on the proposed rule. I respectfully request that you consider my more detailed comments and recommendations provided below.

### **Add licensed or certified physical therapist assistants as TRICARE-authorized providers**

I strongly support the DoD's proposal to add licensed or certified physical therapist assistants (PTAs) as TRICARE-authorized providers, operating under the same qualifications established by Medicare (42 Code of Federal Regulations (CFR) §484.4). Services must be furnished under the supervision of and billed by a licensed TRICARE-authorized physical therapist.

### *Qualifications*

I support DoD's proposal to tie the qualifications of PTAs under the TRICARE program to Medicare's requirements as codified at 42 CFR §484.4.

### *Supervision*

I agree with DoD's proposal to match TRICARE's supervision requirements to Medicare's.

### *Reimbursement Requirements*

I support DoD's proposal to follow Medicare's requirements as found within Medicare Benefit Policy Manual Chapter 15 and other guidance regarding reimbursement of services provided by PTAs.

Although I support the intent of the proposed rule, I identified two errors within the language of the proposed rule and recommend DoD make the following revisions in final rulemaking:

#### *Codify the term "physical **therapist** assistant" at 32 CFR §199.6*

DoD references "physical therapy assistants" throughout the proposed rule. The term physical therapy assistant is not accurate; rather the correct term is physical therapist assistant (PTA). The term physical therapist assistant is referenced in 42 CFR §484.115; as such, I strongly encourage DoD to codify the term **physical therapist assistant (PTA)** at 32 CFR §199.6.

#### *Eliminate reference to **certified** physical therapists in final rulemaking*

DoD references in the proposed rule that PTAs may provide physical therapy services when supervised and billed "under a licensed or certified TRICARE-authorized physical therapist." After graduation from an accredited physical therapist program, physical therapists must pass a state-administered national licensure examination. Physical therapists are licensed in all jurisdictions. Further, within 32 CFR §199(K)(2)(i), DoD uses the term "licensed registered physical therapist." Therefore, I recommend the DoD eliminate any reference to "certified" physical therapists in final rulemaking.

Finally, to increase access to physical therapy services and enhance beneficiary choice in provider selection, I strongly encourage DoD to promulgate the final rule as soon as possible.

### **Conclusion**

Thank you for the opportunity to comment on the Addition of Physical Therapy Assistants and Occupational Therapy Assistants as TRICARE-Authorized Providers proposed rule.

Sincerely,

[NAME]

[TITLE]