



RI Occupational Therapy Association

H5082

Opposed to bill as currently written

Would Support if Language is Amended to also include Occupational Therapy and Speech Therapy

March 2, 2025

Dear Chairperson Donovan and Members of the House Health and Human Services Committee,

I am writing today as the Advocacy Chair of the Rhode Island Occupational Therapy Association (RIOTA). Thank you for your service.

My letter today will likely seem familiar to those of you who have been part of the committee for some time. It is the stance our association has held since this type of bill was first introduced perhaps in 2017. RIOTA would like to again express support for the spirit of **H5082** but only in the context of a request for amended language. This bill limits copays, coinsurance or office deductibles for services of a physical therapist to the amount authorized for the services of a primary care physician or osteopath on or after January 1, 2026. As in the past we applaud our Physical Therapy colleagues for proposing this bill which would offer improved access to rehabilitation services for Rhode Islanders but recognize that it remains limited in necessary scope.

We respectfully request that this bill only move forward if its language is amended to include Occupational Therapy and Speech and Language Pathology in addition to Physical Therapy. Without this change we must regrettably stand in firm opposition.

RIOTA has reached out to our Physical Therapy colleagues with this request for inclusion of all three major Rehabilitation professions over the years and again for the current bill. At this time, as in the past, RIAPTA has declined to make a change in the language. **This unfortunately now requires RIOTA to stand in opposition to the bill if no language changes are to be made to include Occupational Therapy and Speech and Language Pathology in addition to Physical Therapy.**

Please consider the following:

- Occupational Therapy, Physical Therapy and Speech Therapy are parallel Rehabilitation professions.
- Each provides an important and equally valuable service to consumers and should be managed similarly in relation to copays, coinsurance and deductibles.
- Many clients receive multiple services at the same time and will incur multiple copays
- Lower copays encourage individuals to pursue needed services and better allow those on fixed or lower incomes to complete a full course of therapy
- If one profession's copays are at a lower rate than the others, there is an incentive for clients to seek out only that service though they may need a different one or a combination for optimal outcomes.

- Creating a hierarchy of copays among the three major Rehabilitation Services presents the risk of an inappropriate assumption that one service is more valuable than another. This undermines the teamwork model that has been historically present in the Rehabilitation world.
- Inclusion of all three major Rehabilitation Services in this legislation would demonstrate equity and provide for optimal choice to consumers

Reduction of copays is an important change that affords better access to all rehabilitation services and should be actively pursued. RIOTA believes we can all agree that there has been an observed trend of gradually increasing deductibles, coinsurance, and copays. Some of these increases essentially negate having insurance because they are so high. This causes many clients to have to decide between seeking rehabilitation services and meeting basic personal or household needs. This is not a choice anyone should have to make for themselves or their families when trying to recover from an illness, injury, surgery or other health challenge. **A revised H5082 including all therapies would help to alleviate this.**

One argument made to us by our colleagues in PT is that once their bill is approved it will be easier for OT and Speech to have similar bills passed. With all due respect, this defies common sense. As insurers are required (and appropriately so) to shoulder more of the costs, it stands to reason that there will be more not less resistance to lowering the copays of other professional services.

Another consideration that became clear at last year's Senate Health and Human Services hearing on April 4, 2024 is the structure of the bill itself. Comparing one profession to another when setting copay rates presents the likelihood of a compensatory response from insurers to raise the copay or premiums to offset costs. This is exactly what was included in the testimony by the Blue Cross Blue Shield representative last year when he mentioned that in order to decrease copays for PT they would likely need to increase those for Primary Care providers. This clearly is not the intended purpose of the bill and perhaps there is a better way to structure the legislation to avoid this issue.

It is approximately 8 years since this bill has been circulating through the legislature without passage. Clearly it is time for a different approach to improve access to care that we all support. It is RIOTA's belief that this would be best done together. We would much prefer to stand with our colleagues in Physical Therapy and Speech and Language Pathology instead of having to oppose a bill which, as written, would only benefit a portion of the population we all serve.

In summary, Occupational Therapy, Physical Therapy, and Speech and Language Pathology are parallel Rehabilitation Professions which have historically been managed the same way by insurance carriers. They are equally important and essential to the care of our clients who frequently need more than one service. For the sake of our clients, it is essential that all 3 major Rehabilitation professions continue to be treated in the same manner in regard to copays, coinsurance and deductibles as well as utilization review procedures.

RIOTA urges the committee to consider amended language as requested and once in place to pass this bill in order to support the health and wellness of Rhode Islanders by easier access to Rehabilitation Services.

Thank you for your time and consideration.

Respectfully submitted,

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