

January 14, 2021

Justin Elliott  
Vice President, Government Affairs  
American Physical Therapy Association  
3030 Potomac Ave., Suite 100  
Alexandria, VA 22305-3085

RE: Levels of Patient Direct Access

Dear Mr. Elliott:

CNA has been the underwriting company for the APTA-endorsed physical therapy professional liability insurance plan, offered by Healthcare Providers Service Organization, since 1992, and is responsible for managing reported claims.

CNA insures physical therapists who are employed and practice in various locations and specialties. As part of our underwriting due diligence, CNA regularly monitors professional liability claim trends to help ensure that we are adequately accounting for new and emerging risks.

We are aware that as of January 1, 2021 all 50 states, the District of Columbia, and the U.S. Virgin Islands allow patients direct access to physical therapist services for both evaluation and some level of treatment without a physician referral. The level of access to treatment without a referral can be categorized as limited, provisional, and unrestricted. We regularly monitor trends to be sure that we are adequately accounting for all risks. The current actuarial summary of the CNA/HPSO Program indicates that the average loss experience from physical therapy services in all states to be similar and not influenced by the level of patient direct access.

Based on the above, our underwriting practices have not changed. Level of patient access is not a risk factor that we specifically screen for in the underwriting of our program nor do we charge a premium differential for physical therapists in states with unrestricted patient direct access. We currently have no specific underwriting concerns with respect to direct access for physical therapists or the level of patient access.

Sincerely,

Michael Loughran  
President-Healthcare

Copy: Michael A. Scott; CNA Healthcare

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