

March 27, 2025

The Honorable Susan Donovan, Chair, House Committee on Health and Human Services  
Via email to: [HouseHealthandHumanServices@rilegislature.gov](mailto:HouseHealthandHumanServices@rilegislature.gov)

**Re: House Bill 5082, relating to business and professions (Physical Therapists copay)**

Dear Chairwoman Donovan and Members of the Committee:

On behalf of Blue Cross & Blue Shield of Rhode Island (Blue Cross), I am writing to share information and express concern about this proposal to require a health plan to set the cost sharing for physical therapy services at an amount equal to or less than that for primary care physicians or osteopaths.

We share the sponsor's commitment to the role of physical therapy in a member's health, but we respectfully offer the following thoughts regarding the cost sharing rules this bill would impose.

**Blue Cross purposely maintains low, and varying, cost-sharing levels for primary care.** The General Assembly and the Health Insurance Commissioner have prioritized access to primary care. Primary care providers play a critical role in healthcare. Blue Cross, on behalf of its members, invests millions of dollars in primary care practices, enabling them to improve care for all their patients.

Relevant to this bill, health plans are intentionally designed so that patients pay less for primary care, with some plans offering even lower cost sharing at the most advanced practices (patient centered medical home) and low or no cost sharing for some services (for example, sick visits).

**This proposal takes away Rhode Islanders' options for lower-priced plans.** Blue Cross offers a range of plan designs with different levels of cost sharing for various kinds of care. Employers and individuals want the ability to select the coverage and premium that meets their needs. Cost sharing for physical therapy, along with other care, ranges depending on the plan. This proposal would result in costs shifting into premiums or onto the cost sharing of other services.

**Mandating low cost-sharing for a specific service, or disease, creates a difficult dilemma.** Advocates for individuals with other conditions or needing other services have and will petition for similar legislation. The issue of capping copayments is happening for specialty drugs, insulin equipment and supplies, epi pens, asthma inhalers, and imaging. Preferential cost sharing limits shift expenses into premiums, making insurance coverage less affordable for everyone.

That said, Blue Cross recognizes physical therapy's value and welcomes conversations with physical therapists on improving communication about their services, as described in part (b) of the bill.

We appreciate your consideration of these concerns. Please feel free to contact me with any questions.

Sincerely,  
  
Richard Glucksman, Assistant General Counsel