

October 7, 2015

Senator Mark Warner  
Senator Rob Portman  
Committee on Finance  
U.S. Senate  
Washington, DC 20510

Dear Senators Warner and Portman:

The Private Practice Section (PPS) of the American Physical Therapy Association is gratified by the news that you introduced legislation that would reform and simplify the ACA's reporting requirements affecting employers and insurers.

The over 4200 members of PPS own and operate small businesses that provide convenient, cost-effective rehabilitative therapy to patients across the spectrum of impairments and functional limitations secondary to neurologic and/or musculoskeletal conditions. The PPS endeavors to foster the growth, economic viability, and business success, of physical therapist-owned physical therapy services provided for the benefit of the public.

PPS has strongly endorsed S.1996, the *Commonsense Reporting Act* which would reform the ACA's reporting requirements affecting employers and insurers. PPS members with more than 50 employees are among the business owners who are obligated to follow the time consuming and cumbersome health plan related reporting requirements under the Affordable Care Act (ACA). Compliance with the individual and employer mandates would be completed through a voluntary reporting system where employers can provide some data up-front to verify that the health plan offered meets the employer mandate. Back-end reporting would only be required for employees who utilize tax credits or cost-sharing subsidies for Exchange coverage rather than for all workers. PPS applauds the commonsense goal to streamline the employer reporting process and strengthen the eligibility verification process for the health care premium tax credit and cost-sharing subsidy, all while reducing both employer and employee frustration with the process.

While few members of the PPS are large enough to be subject to the ACA's reporting requirements, they see S.1996 as good public policy that responds to the needs of small business owners with over 50 full time equivalent (FTE) employees who are thereby obligated under the ACA to provide qualifying health coverage to their employees. We hope this can be achieved so as to reduce the administrative burden on our small business men and women. It is our hope that additional stakeholder engagement and bipartisan support can lead to passage of this legislation.

PPS members are dedicated to providing high-quality, convenient, and cost-effective physical therapy services to our patients. In fact, membership in PPS is contingent upon our practices measuring and reporting quality and patient outcomes data. We strive to continue to focus on that care as our patients, not burdensome paperwork, are our priorities.

Sincerely,

A handwritten signature in black ink that reads "Terrence C. Brown". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Terrence Brown, PT, DPT  
President, Private Practice Section of APTA