

June 10, 2025

Submitted electronically at regulations.gov. RE: CMS-1833-P

Hospital Inpatient Prospective Payment Systems for Acute Care Hospitals and the Long-Term Care Hospital Prospective Payment System and Policy Changes and Fiscal Year 2026 Rates; Requirements for Quality Programs; and Other Policy Changes

To whom it may concern,

We are pleased to have the opportunity to respond to the Center for Medicare and Medicaid Services' (CMS) proposed IPPS policy changes for acute care hospitals in 2026. Our institution, Hospital for Special Surgery (HSS) is the world's leading academic medical center focused on musculoskeletal health and the oldest orthopedic hospital in the United States. HSS has been ranked number 1 for orthopedics for 15 consecutive years by *U.S. News & World Report* and has been among the top-ranked hospitals for both orthopedics and rheumatology for 33 consecutive years. We are committed to advancing value-based care as a means to advance population health and to ensure the viability of the Medicare Trust for our grandparents, parents, and future generations.

The TEAM Model aims to reduce fragmentation in surgical care episodes and improve care coordination for all providers involved in a 30-day surgical episode. The musculoskeletal procedure episodes often include post-surgical physical therapy and rehabilitation care for which virtual physical therapy (tele PT) is a safe and innovative solution for the appropriate patient population when furnished by a trained provider.

HSS is a leader in the tele PT space. In 2018, HSS launched a post-acute telehealth program, HSS@Home, in response to CMS's Comprehensive Care for Joint Replacement program. The program grew rapidly, with over 1,400 tele PT visits performed in 2019 compared to 54 visits in 2018. With the increase in telehealth popularity due to the pandemic, HSS@Home grew to over 26,000 visits between 2020 and 2023 and is on pace for more than 7,500 visits in 2024. HSS also successfully transitioned a significant amount of ambulatory outpatient physical therapy care to telehealth during the COVID-19 pandemic. In 2020, 35% of all visits provided were tele PT with 62,000 tele PT visits, compared with 114,000 in-person visits. As the pandemic slowed and the public health emergency ended, telehealth has decreased to 9%, 5% and 4% of total visits in 2021, 2022, and 2023 respectively. Even with the ability to perform tele PT, a high majority of care has returned to in-person visits. However, at HSS tele PT remains an important option for use cases that best meet patients' needs, and it is critical that it stay that way.

HSS supports policy permanently allow physical therapists to have ability to offer telehealth services to Medicare patients, and without such policy, the continuity of care

for certain patients could be disrupted for surgical episodes under TEAM. CMS is working to drive innovative solutions for surgical care to improve patient outcomes and lower costs, and the ability to provide tele PT contributes to those efforts. We urge CMS to work with Congress to establish permanent policy to allow physical therapists to continue providing telehealth services to Medicare patients in order to maintain care continuity for post-operative care. Physical therapists are essential to surgical care and tele PT is the right option for some patients

We appreciate your consideration of our responses and are happy to provide clarification. For any questions regarding the HSS experience please contact me directly.

Best regards,



Mary Cassai MPA, RN
Executive Vice President
Chief Operating Officer