

From: [REDACTED]
To: [ETF SMB Board Feedback](#)
Subject: 2025 Benefit Changes
Date: Wednesday, November 8, 2023 2:34:19 PM

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Dear Board,

The “Preliminary 2025 Benefit Agreement Changes” proposal change #F.32 Physical Speech and Occupational Therapy benefits reduction is a mistake. Reducing the limit of visits from 50 to 25 will be detrimental to patient care. Nobody has any control over how many therapy visits they need. You would be cutting costs by setting an arbitrary limit that has no medical basis or justification. I would at least ask for some kind of evidence that more than 25 visits is by definition unnecessary or excessive before making your decision.

Respectfully,

Chad Simandl
State employee



STATE OF WISCONSIN
Department of Employee Trust Funds
A. John Voelker
SECRETARY

Wisconsin Department
of Employee Trust Funds
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November 10, 2023

Chad Simandl
[REDACTED]

Dear Chad Simandl:

Thank you for your email to the Department of Employee Trust Funds (ETF) about the [“Preliminary 2025 Benefit and Agreement Changes”](#) memo on the proposed change to modify the limit of visits per discipline for physical, speech and occupational therapy.

As part of our annual review, ETF analyzes changes made to federal and state laws, requests from members, and input from health plans and other stakeholders. The proposed changes included in the November Group Insurance Board (Board) meeting materials are requests ETF has received. They are currently only suggestions or requests that ETF will be researching before making any final recommendations.

To clarify this particular request, the change would separate the limits to 25 visits for each therapy type (physical, speech and occupational) before prior authorization is required, versus the current combined 50 visit limit for all three types. It was suggested that this would be easier to administer by the health plans. We recognize, however, that there may be an impact on our members if a prior authorization is not approved. Thus, additional research on member utilization of the therapies, administration burden on the health plans and a cost-benefit analysis is needed.

Your comments to the proposed change to physical, speech and occupational therapy visit limitations will be considered as ETF continues its research and review of the proposed changes. We will consult with stakeholder groups, the Board’s vendors, and the Board’s actuarial firm (Segal) before presenting final change recommendations to the Board in February 2024.

Again, thank you for your email. If you have any other questions, comments, or concerns, please do not hesitate to contact me using the information below.

Sincerely,

Luis Caracas, Health Plan Policy Advisor

Chad Simandl
November 10, 2023
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