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Dear Medicaid Provider Rate Review Advisory Committee:  

I am writing to you today to ask you to raise the reimbursement rate for code 97113 (aquatic therapy with therapeutic exercise) to equal value of the other physical therapy codes. I am a pediatric physical therapist and have been treating patients in an aquatic environment since 2011. During that time, I have witnessed the significant power of this environment to implement physical therapy interventions that help patients meet their goals.  

The aquatic physical therapy code has a much higher reimbursement in most other states, as well as in Colorado Medicare and other insurance companies. Currently, the reimbursement for 97113 is approximately $10/unit for Colorado Medicaid patients. This is financially limiting for nearly all practices, especially those treating a pediatric population, since many pediatric patients have CO Medicaid as either primary or secondary insurance. As a result, I am currently the only pediatric provider of aquatic physical therapy in Northern Colorado (that I am aware of). Wyoming reimburses $36.12/unit for 97113, New Mexico reimburses $30.68/unit, and Oklahoma reimburses $35.05/unit. The Medicare reimbursement of 97113 is approximately $40/unit. Most physical therapy codes in Colorado (97110, 97112, 97140, 97530) have a reimbursement closer to $30/unit. Physical therapy in an aquatic environment requires a higher reimbursement rate due to the skilled services provided and extra costs of running a pool or renting pool space.  

Physical therapy in an aquatic environment is a research-based location to provide intervention. Research has shown aquatic physical therapy to be effective for many conditions, including low back pain, chronic pain, stroke, cerebral palsy, scoliosis, obesity, multiple sclerosis, arthritis, and many other conditions. Please see the attached citations.  

I propose 2 possible solutions to ensure that all patients have access to the benefits of aquatic therapy:  

1) Raise the reimbursement rate of 97113 to equal or greater value of the other therapy codes to allow providers to use correct coding during treatment and account for the increased cost of running or renting a pool facility.  

2) Clarify the expectation of when 97113 should be used. If using other therapy codes is acceptable during hands on treatment in the water, clarify when the 97113 code should be used and when other therapy codes should be used.  

In conclusion, aquatic physical therapy is a research-based, skilled intervention that all patients should have access to, regardless of financial status or insurance carrier. Please consider increasing and/or clarifying the use of this code during utilization by Colorado Medicaid providers.  

Sincerely,  
Susan Hunt, PT, DPT
Citations supporting Physical Therapy in an Aquatic Environment


Lim, Jae-Young, Tchae E, Jang SN. Effectiveness of Aquatic exercise for obese patients with knee osteoarthritis: a randomized controlled trial. PM&R. 2010;2:723 – 731.

