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July 28, 2017

Catherine I. Hanson
Whatley Kallas, LLP
1 Sansome Street, 35th Floor, PMB #131
San Francisco, CA 94104

RE: Independent Physical Therapists of CA v One Call Medical, Inc.

Dear Ms Hanson,

On behalf of the more than 95,000 members of the American Physical Therapy Association (APTA) and the more than 8,400 members of the California Physical Therapy Association (CPTA), we are writing to you regarding the issues raised in the recent court filing against One Call Medical, Inc. (OCM) by the Independent Physical Therapists of California (IPTCA).

The complaint accuses OCM of running an illegal patient referral scheme driven by improper financial inducements, interfering with the right of injured workers to choose a treating provider within an employer's medical provider network, and acting as a claims administrator without being certified to do so.

Among other things, the complaint alleges that OCM limits the referrals it gives to physical therapists who do not agree to the deepest discounts OCM demands but remain contracted at higher rates, referring to them only when OCM cannot refer the injured worker to a practice that has contracted with it at a lower rate in the same geographic area. Such behavior could be considered a violation of California Labor Code Section 3215, which prohibits offering or accepting any kind of compensation or inducement in exchange for patient referrals.

APTA and CPTA remain committed to ensuring patient access and patient choice. The allegations in the complaint are deeply troubling. If the allegations are true, the challenged actions represent a scheme in which potential profits—and not the best interests of the patient—are driving OCM's decisions on patient care.

Both associations are eager for the court's determination in this case, given the potential impact on patients in California who are in need of rehabilitation services. Therefore, APTA and CPTA *express our support* for the efforts by IPTCA to pursue this issue by legal action.

Sincerely,

A handwritten signature in black ink that reads "Sharon L. Dunn". The signature is written in a cursive style with a large, prominent initial 'S'.

Sharon Dunn, PT, PhD
President, American Physical Therapy Association

A handwritten signature in black ink that reads "Chris Powers". The signature is written in a cursive style with a large, prominent initial 'C'.

Christopher Powers, PT, PhD
President, California Physical Therapy Association