



December 21, 2011

Mr. Justin Elliot
Associate Director, State Government Affairs
American Physical Therapy Association
1111 Fairfax Street
Alexandria, VA 22314-1488

RE: Manipulation Claims

Dear Mr. Elliot,

CNA has been the underwriting company for the APTA-endorsed physical therapy professional liability insurance plan, offered by Healthcare Providers Service Organization, since 1992, and is responsible for managing reported claims.

After reviewing our claims database, which includes approximately 3,889 closed physical therapist claims, we have not identified any trends relative to manipulation that would indicate this procedure presents a risk factor that we need to be specifically concerned about.

Further, we currently do not foresee the practice of manipulation by a licensed physical therapist as having any immediate claim or rate impact on this business.

Please note that all findings stated herein are based solely upon CNA specific claim data. If I can be of any further assistance, please let me know.

Sincerely,

Michael Loughran
President, Healthcare

Copy: Michael A. Scott/CNA HealthPro