



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

Submitted via email: networkadequacy.mia@maryland.gov

May 4, 2017

Lisa Larson, Assistant Director of Regulatory Affairs
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, MD 21202

RE: Proposed Network Adequacy Regulations

Dear Ms. Larson:

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 191,500 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 3,750 members reside in Maryland. On behalf of those members, I am submitting the following comments on the proposed network adequacy regulations.

Rehabilitative and habilitative services and devices encompass a wide range of benefits that are critical to individuals with injuries, illnesses, disabilities, and chronic conditions, including but not limited to physician services, speech-language pathology, physical therapy, occupational therapy, audiology services, hearing aids, augmentative and alternative communication devices, and other medically necessary services and devices. These services and devices can be provided in an array of settings (e.g., hospitals and other inpatient settings, outpatient therapy clinics and offices, in a person's home) and be provided at various levels of intensity, duration, and scope depending on the severity of the condition and the functional impairment presented by the particular individual.

Under .04 A(2) the maximum distance requirement for speech therapy (ST) is 15 miles for a large metro area, but the requirement is 10 miles for physical therapy (PT) and occupational therapy (OT). It is unclear why the travel distance for ST is greater than the suggested travel distance for OT and PT. We want to request that the large metro area maximum distance for ST be the same as OT and PT. They are all therapy providers who treat similar patients, but they each provide distinct services focused on different functional goals.

Under .04 B(2) speech therapy is omitted in the table for *Staff Model HMO Plans* as a specialty for which geographic area distance requirements apply. Speech-language pathologists meet the definition of a specialty provider and should be included in this table and the distance requirements should be the same as those for OT and PT, which are 15 miles for large metro area maximum, 30 miles for metro area maximum, 60 miles for micro area maximum, and 60 miles for rural area maximum.

Thank you for the opportunity to comment. Should you have any questions or need further information, please contact Susan Adams, ASHA's director of state legislative and regulatory

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advocacy, at sadams@asha.org or by phone at 301-296-5665, or Daneen Grooms, ASHA's director of health reform analysis and advocacy, at dgrooms@asha.org or by phone at 301-296-5651.

Sincerely,

A handwritten signature in cursive script that reads "Gail J. Richard". The signature is written in black ink and is positioned above the typed name.

Gail J. Richard, PhD, CCC-SLP
2017 ASHA President