Maryland Occupational Therapy Association

PO Box 36401, Towson, Maryland 21286 ♦ motamembers.org

To:	Maryland Insurance Administration
From:	Maryland Occupational Therapy Association
Re:	Draft Network Adequacy Regulations
Date:	August 2, 2022

Thank you for the opportunity to comment on the draft network adequacy regulations. The Maryland Occupational Therapy Association (MOTA) appreciates the work MIA has done to ensue Maryland consumers have access to necessary services. We would like to request the inclusion of all habilitative service providers (i.e., occupational therapists, speech-language pathologists, and physical therapists) in 31.10.44.5 (A)(4).

We believe that this change will help further the work MIA has already done to improve access to habilitative services. In 2013, MIA hosted the Workgroup on Access to Habilitative Services Benefits and issued a report on the access issues facing patients in need of habilitative services. The report included several important findings including reports from parents about difficulty in accessing habilitative services due to "a lack of quality in-network providers; an insufficient number of in network providers in certain areas of the State; long waiting lists to see in-network providers[.]" Additionally, the report highlighted a survey of 772 families that found that of the surveyed families, many were not receiving adequate habilitative services for their child (19.9% needed increased speech/language therapy, 14.9% occupation therapy, 5% physical therapy). Finally, it was noted that workgroup members expressed particular concern about access to care in our rural counties. MOTA greatly appreciated the work MIA has already done on this important issue and believe that an explicit inclusion of all habilitative providers in the network adequacy would help continue to advance this important issue.

If we can provide any additional information, please contact Scott Tiffin at stiffin@policypartners.net.