

October 27, 2025

Ricardo Lara
Insurance Commissioner
State of California
Department of Insurance
Health Claims Bureau
200 South Spring Street, South Tower
Los Angeles, CA 90013

Re: Kaiser Permanente Beneficiaries Cannot Access Medically Necessary Services

Dear Commissioner Lara:

On behalf of the American Speech-Language-Hearing Association (ASHA) and the California Speech-Language-Hearing Association (CSHA), we are writing to share serious concerns reported by speech-language pathologists (SLPs) regarding Kaiser Permanente. Patients who have already received authorization for medically necessary care continue to face significant barriers to accessing services in a timely manner.

ASHA is the national professional, scientific, and credentialing association for 241,000 members, certificate holders, and affiliates who are audiologists; SLPs; speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 17,000 ASHA-certified SLPs reside in California.¹ CSHA is the state association representing over 3,000 SLPs, audiologists, speech-language pathology and audiology support personnel, and students.²

ASHA and CSHA member SLPs report that Kaiser beneficiaries who need medically necessary pediatric habilitation services are unable to obtain timely care or an appropriate number of sessions—even after approval for care. In many cases, patients are receiving approval for three months of therapy under their Kaiser plan but cannot schedule sessions in a timely manner due to long waitlists among in-network providers forcing some patients to wait for their first treatment session. This is preventing patients from obtaining the clinically appropriate number of sessions within the approved timeframe. In some cases, patients are only able to attain two to three sessions during the entire three-month authorization period—far below the clinically appropriate level of care.

These access barriers violate California Health and Safety Code 1367.03, which requires that patients have access to nonurgent care appointments within 15 business days of their request. Even if a provider extends that timeframe and documents that a longer wait will not harm the patient's outcomes, patients are still unable to access appropriate care to meet their treatment needs.

Patients also report being denied extensions to their three-month treatment window, which would otherwise allow them to receive medically necessary services when it is clinically appropriate beyond the 15-business day limit. As a result, many out-of-network providers report that Kaiser beneficiaries are seeking cash-pay arrangements to supplement the clinically

insufficient services available through Kaiser—despite receiving approval for three months of therapy services and California’s requirement for timely access to care.³

The National Business Group on Health’s *Investing in Maternal and Child Health: An Employer’s Toolkit* recommends a **minimum of 75 visits per year for a combined speech-language pathology, occupational therapy, and physical therapy benefit**. This equates to an average of 25 visits per year for speech-language pathology, though the final number would be based on the patient’s particular needs. By contrast, two to three visits are far from sufficient to help patients reach their therapy goals.⁴

In August, ASHA met with representatives from your office and subsequently reached out to Kaiser Permanente staff to express concerns, offer resources, and request a meeting. To date, Kaiser Permanente has not responded.

ASHA and CSHA will advise its members and their patients on submitting complaints directly to your Department regarding these access challenges, and we wanted to provide advance notice that such complaints may be forthcoming.

Thank you for your attention to this matter. If you have any questions, please contact Meghan Ryan, MSL, ASHA’s director for health care policy for private health plans, at mryan@asha.org or 301-296-5669.

Sincerely,



A. B. Mayfield-Clarke, PhD, CCC-SLP
2025 ASHA President



Sarah Bishop, CCC-SLP
2025 CSHA President

¹ American Speech-Language-Hearing Association. (2024). *California* [Quick Facts]. <https://www.asha.org/siteassets/advocacy/state-flyers/california-state-flyer.pdf>

² California Speech Language Hearing Association. (2025). *About us*. <https://www.csha.org/about-us/>

³ California Legislative Information. (2022). *Health and Safety Code Section 1367.03*.

https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC§ionNum=1367.03

⁴ National Business Group on Health. (2007). *Investing in Maternal and Child Health: An Employer’s Toolkit*. https://www.asphn.org/resource_files/61/61_resource_file1.pdf