



July 31, 2020

Ms. Patty Salazar, Executive Director
The Department of Regulatory Agencies
Division of Insurance
1560 Broadway, Suite 850
Denver, CO 80202

RE: ASHA Support for Emergency Regulation 20-E-11

Dear Ms. Salazar:

On behalf of the American Speech-Language-Hearing Association, I write in support of emergency regulation 20-E-11, which requires carriers to continue reimbursing providers, including speech language pathologists, for the provision of telehealth services using non-public facing audio and video communication during the COVID-19 emergency.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for more than 211,000 members and affiliates who are audiologists; SLPs; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 4,200 ASHA members reside in Colorado.

As the leading national organization for the certification and advancement of audiologists and speech language pathologists (SLPs), ASHA supports the development and use of telehealth. ASHA maintains a collection of professional practice documents, including a position statement that defines telehealth as “the application of telecommunications technology to deliver professional services at a distance by linking clinician to client, or clinician to clinician for assessment, intervention, and/or consultation.”

These documents include a technical report and service delivery guidelines that may be accessed on ASHA’s website.¹

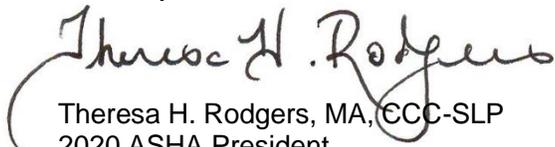
ASHA strongly supports the use of and reimbursement for telehealth. Research demonstrates the equivalence of telehealth to in-person service delivery for a wide range of diagnostic and treatment procedures for adults and children.² Studies have shown high levels of patient, clinician, and parent satisfaction supporting telemedicine as an effective alternative to the in-person model for delivery of care.³ Telehealth expands practitioners’ availability to those in need—regardless of geographic location—saving time and resources for both the provider and the patient.

Despite proven benefits, telehealth remains underutilized within both audiology and speech-pathology due to a lack of clear state laws governing its use or mandating appropriate reimbursement for services delivered. This regulation helps to ensure that those requiring services throughout Colorado will continue to receive them during these challenging times.

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Thank you for your consideration of ASHA's position to support emergency regulation 20-E-11. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director, state association relations, at ecrowe@asha.org.

Sincerely,

A handwritten signature in black ink that reads "Theresa H. Rodgers". The signature is written in a cursive style with a large, sweeping initial 'T'.

Theresa H. Rodgers, MA, CCC-SLP
2020 ASHA President

¹ The American Speech-Language-Hearing Association. (n.d.) *Practice Portal: Telepractice*.

<http://www.asha.org/Practice-Portal/Professional-Issues/Telepractice/>

² Grogan-Johnson, S., Alvares, R., Rowan, L., & Creaghead, N. (2010). A pilot study comparing the effectiveness of speech language therapy provided by telemedicine with conventional on-site therapy. *Journal of Telemedicine and Telecare*, 16, 134–139.

³ Ibid.