



ASHA
American
Speech-Language-Hearing
Association

Submitted via email: victor.a.mullins@wv.gov

July 24, 2020

Victor Mullins, Associate Counsel
Insurance Commission
900 Pennsylvania Avenue
Charleston, WV 25302

RE: Health Benefit Plan Network Access and Adequacy (114-100)

Dear Mr. Mullins:

On behalf of the American Speech-Language-Hearing Association, I write to comment in support of the Insurance Commission's proposed rules for health benefit plan network access and adequacy. This proposal would ensure greater transparency about the availability of covered providers within state-regulated health plans and enhance access to audiology and speech-language pathology services for consumers, particularly in rural areas.

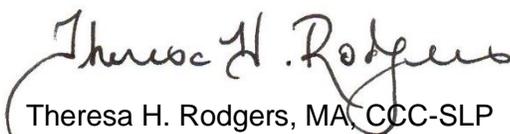
The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 211,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 1,000 ASHA members reside in West Virginia.¹

ASHA lauds the Commission for including audiologists and speech-language pathologists (SLPs) under the list of specialty providers covered under Section 3.2. ASHA also supports the Commission's decision to determine carrier compliance with the network adequacy standards established under Section 3.2 using a time and distance standard to evaluate the geographic accessibility of covered specialists. Alternative approaches to geographic accessibility, such as a ratio of providers to patients, are insufficient because they do not consider individual patient needs.

Even within specific disciplines, ensuring appropriate access to providers to meet a range of patient needs is a complex task. For example, an SLP with expertise in treating aphasia among adult patients recovering from a stroke or traumatic brain injury, may not be able to effectively care for a child requiring pediatric dysphagia treatment. A ratio or formula standard may lead to long wait times and/or long drives to appointments, especially for those in need of specialty services.

Thank you for the opportunity to share ASHA's position regarding the proposed rules. If you or your staff have any questions, please contact Tim Boyd, ASHA's director of state health care and education affairs, at tboyd@asha.org.

Sincerely,



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

¹ American Speech-Language-Hearing Association. (2020). *West Virginia* [Quick Facts]. <https://www.asha.org/uploadedFiles/West-Virginia-State-Flyer.pdf>.