



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

Submitted via email to: Nathaniel.Dorfman@dfs.ny.gov

August 7, 2018

Nathaniel Dorfman
New York State Department of Financial Services
One State Street
New York, NY 10004

RE: New York Essential Health Benefits

Dear Mr. Dorfman:

On behalf of the American Speech-Language-Hearing Association, I write to support efforts in New York to codify requirements for the provision of essential health benefits in health insurance policies.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 17,000 of our members reside in New York.

ASHA supports the inclusion of hearing aids and speech therapy as a covered device and service of habilitation and rehabilitation as a vital essential health benefit. The therapeutic services provided by ASHA members meet the needs of various children and adults with impairments related to conditions such as autism, cardiovascular disease, cerebral palsy, traumatic brain injury, ototoxic medications, Parkinson's disease, epilepsy, stroke, and multiple sclerosis. Americans rely on their health care coverage to acquire or regain skills and functions due to a disability, illness, disease, or accident and to maintain these skills so that they can live as independently as possible.

ASHA also requests the addition of audiology services that include aural therapy. Evidence suggests that adults receiving group audiologic rehabilitation show benefits in reduction of perceived hearing handicap, improved quality of life, better use of hearing aids, and communication strategies.*

Thank you for the opportunity to provide comments on this regulation. If you or your staff have any questions, please contact Susan Adams, ASHA's director of state legislative and regulatory affairs, at sadams@asha.org.

Sincerely,

Elise Davis-McFarland, PhD, CCC-SLP
2018 ASHA President

* Hawkins, D. (2005). Effectiveness of Counseling-Based Adult Group Aural Rehabilitation Programs: A Systematic Review of the Evidence. *Journal of the American Academy of Audiology*. 16(7), 485-493. Retrieved from <https://doi.org/10.3766/jaaa.16.7.8>.