



Submitted via email: h72@iga.in.gov

February 12, 2020

The Honorable Edward Clere
200 W. Washington Street
Indianapolis, IN 46204

RE: HB 1176

Dear Representative Clere:

On behalf of the American Speech-Language-Hearing Association, I write to offer comments in support of House Bill 1176, which eliminates prior authorization for services covered in a child's Individualized Family Service Plan (IFSP), and includes habilitation services under the definition of early intervention services.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 204,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 3,300 ASHA members reside in Indiana.

Prior Authorization

The Individuals with Disabilities Education Act (IDEA) requires the IFSP team of qualified professionals, parents, and caregivers to develop a plan of care following a comprehensive evaluation.¹ The plan outlines an individualized treatment program based on the child's strengths and challenges, as well as the family's needs. An IFSP team must adhere to strict timelines so that young children and their families receive needed services as soon as possible. Requiring prior authorization to begin treatment is unnecessary and may delay valuable treatment time for a child with a disability.

Habilitation Services

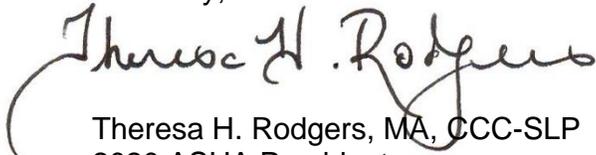
The Affordable Care Act (ACA) requires health plans to cover habilitation and rehabilitation services, which are defined as Essential Health Benefits.² Habilitation services, which enable young children to keep, learn, or recover skills, are particularly critical as the skills acquired in the early years serve as the foundation for those learned later in life.

ASHA applauds your efforts to provide timely and effective early intervention services for young children and their families with specialized needs. Early identification and treatment of a communication disorder, for example, may make all the difference in a child's ability to acquire and use language effectively throughout his/her life.

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Thank you for your consideration of ASHA's position in support of HB 1176. If you or your staff have any questions, please contact Janet Deppe, ASHA's director of state affairs, at jdeppe@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 Individuals with Disabilities Education Act, 34 U.S.C. § 300.320 et seq.

² Affordable Care Act, 42 U.S.C. § 18022. Section 1302(b)(1)(G): Coverage of Rehabilitation and Habilitation Services. Retrieved from <https://www.law.cornell.edu/uscode/text/42/18022>.