



Submitted via email: bob.onder@senate.mo.gov

January 31, 2020

The Honorable Senator Bob Onder
201 W. Capitol Ave., Rm 226
Jefferson City, MO 65101

RE: Senate Bill 836

Dear Senator Onder:

On behalf of the American Speech-Language-Hearing Association, I write to offer comments on Senate Bill 836, which modifies provisions to short-term medical insurance.

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 4,100 ASHA members reside in Missouri.

ASHA generally opposes the use of short-term, limited duration (STLD) insurance plans as replacements for more comprehensive forms of health care coverage. However, with proper consumer protections in place, such as limits on plan renewability and duration, STLD plans may be appropriate for certain individuals without coverage—such as students who are too old to be on their family's plan or individuals between jobs. These protections are necessary to aid consumers who may purchase a short-term plan believing it will provide the same amount of coverage as traditional health insurance.

Unlike insurance sold under the Affordable Care Act, STLD plans are not required to cover Essential Health Benefits, including habilitation and rehabilitation services.¹ Access to these services are critical for Missourians who suffer from a communication disorder and for whom an STLD plan is not a suitable form of insurance.

Senate Bill 836 adds necessary protections for individuals interested in purchasing STLD plans, such as information about coverage limitations, deductibles, and coinsurance. It also requires insurers offering such plans to provide confirmation that the prospective insured has received a benefit statement in writing with detailed explanations about the limitations of many standard benefits.

ASHA maintains that it is critical to notify the public in writing about coverage limitations that individuals choosing STLD plans may lose access to, including assessment and treatment from audiologists and speech-language pathologists.

If STLD plans are provided to the prospective insured, ASHA supports the reporting provisions in Senate Bill 836 so that the public is informed about the coverage and limitations of the plans they may choose to purchase.

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Thank you for considering ASHA's position on Senate Bill 836. 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, looping initial "T".

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

¹ Cornell Law School. (n.d.) *Affordable Care Act 42 US Code § 18022. Section 1302(b)(1)(G): Coverage of Rehabilitation and Habilitation Services*. Retrieved from <https://www.law.cornell.edu/uscode/text/42/18022>.