



January 9, 2023

Richard Lask, MD
Medical Director
Oxford Health Plans
48 Monroe Turnpike
Trumbull, CT 06611

Dear Dr. Lask:

On behalf of the American Speech-Language-Hearing Association, I write to express concerns about the recent Oxford Health Plan decision to discontinue coverage for children in need of early intervention services who reside in the state of New York.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists (SLPs) identify, assess, and treat speech and language problems, including swallowing and cognitive disorders. Nearly 18,000 ASHA members work and reside in New York.¹

ASHA is concerned that the implementation of Oxford's newest plan update will negatively impact patients' access to care and increase the burden placed on the resources available for children in New York. Patients will see a disruption in care while transitioning to the new policy.

Based on the information gathered from ASHA members and our research on the program, ASHA raises concerns on the following topics:

- Disruption in Care During Transition
- Limited Resources in the State Early Intervention Space
- Access to Care

Disruption in Care During Transition

With the implementation of this change ASHA is concerned that children will be subject to an unnecessary gap in their care, which can cause a deterioration in any progress that they have previously made. The development of resources and assistance for these plan holders will be imperative to ensure a smooth transition should this go into effect.

Limited Resources Available in State Early Intervention

Resource limitations in the therapy space are of utmost concern. There are constant reports of too many patients and not enough credentialed providers to service all of them. This policy will further burden the state system for early intervention by adding additional children to the program once they lose coverage under their commercial insurance plan.

Access to Care

ASHA's primary concern is the access to care issue that this change will create. Many patients in the northeast live in one state and seek their therapy services in another given the proximity

of many states to one another. This change will not only require patients to change providers but will also pose the issue of needing to travel across state lines to access care. This will cause an increased number of patients who miss visits or who are unable to schedule their care due to other obligations and travel time.

ASHA looks forward to working with you on this policy change and any others forthcoming. We aim to participate with all payers in a proactive way to impact change in the fields of audiology and speech-language pathology. ASHA staff would like to schedule a meeting to better understand this policy and ensure that no unintentional age-based discrimination is occurring within the policy. If you have any questions, please contact Jacob Manthey, ASHA's director of private health plans, reimbursement, at jmanthey@asha.org. Mr. Manthey will be following up to schedule a meeting to discuss these concerns.

Sincerely,



Robert M. Augustine, PhD, CCC-SLP
2023 ASHA President

¹ American Speech-Language-Hearing Association. (2022). New York [Quick Facts].
<https://www.asha.org/siteassets/uploadedfiles/advocacy/state-fliers/new-york-state-flyer.pdf>.