



August 26, 2019

Phil Bonaparte, MD
VP Clinical Affairs & Chief Medical Officer
Horizon Blue Cross Blue Shield
Three Penn Plaza East
Newark, NJ 07105-2200

Dear Dr. Bonaparte:

On behalf of the American Speech-Language-Hearing Association, I write to express concerns about Horizon's decision to initiate a utilization management program administered by American Specialty Health (ASH) for outpatient speech therapy services in many of Horizon's health plans across the state of New Jersey.

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. Speech-language pathologists (SLPs) identify, assess, and treat speech and language problems, including swallowing disorders. Over 6,800 ASHA members reside in New Jersey.

ASHA is concerned that the implementation of Horizon/ASH's new Chiropractic and Physical Medicine Services program will have a negative impact on both patients and providers by potentially disrupting medically necessary care and decreasing provider reimbursement. The proposed program fails to put patients' needs at the forefront of care and ASHA questions the adequacy of the program in the areas of speech, language, swallowing, and cognition.

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

- Program Participation by SLPs
- Program Participation Requirements
- Authorization/Reauthorization Timeframes
- Impact on Horizon Plan Enrollees
- Maximum Daily Reimbursement Rates

Program Participation by SLPs

The Horizon website indicates its Chiropractic and Physical Medicine Services program will include acupuncture, chiropractic, occupational therapy (OT), and physical therapy (PT) service. The list does not include speech therapy services; however, the correspondence distributed to ASHA members states that speech therapy will be included in the roll out. ASHA requests clarification as to the inclusion/exclusion of speech therapy services in the Chiropractic and Physical Medicine Services program.

Program Participation Requirements

According to the material distributed by Horizon/ASH, providers must indicate their willingness to participate in the Chiropractic and Physical Medicine Services program no later than

November 1, 2019. ASHA is concerned with the proposed timeline and its impact on the ability of potential plan enrollees to accurately evaluate your rehabilitation provider network for 2020.

Authorization/Reauthorization Timeframes

Horizon/ASH have indicated to providers—regardless of condition, comorbidity, or severity—that all patients will be subject to prior authorization after five visits. However, Horizon/ASH has not provided details regarding the prior authorization process. This protocol runs counter to the industry standard for patient-centered care planning. The development of an individualized plan of care requires that SLPs use the best available evidence as well as their clinical judgment and expertise in the evaluation and treatment of their patients. ASHA is concerned that the Horizon/ASH authorization protocol takes clinical judgment out of the hands of qualified providers and replaces it with an arbitrary administrative mandate that fails to differentiate between the needs of a Horizon/ASH plan enrollee who is experiencing some lower back pain compared to an enrollee who has suffered a major stroke.

Impact on Horizon Plan Enrollees

If this program goes into effect, ASHA is concerned that benefits for plan enrollees will be significantly decreased, and Horizon/ASH will not have complete or accurate knowledge of the providers who may or may not be in their network effective January 1, 2020, by the time plan enrollees need to decide whether to contract with Horizon/ASH for their health insurance needs; thus, making it difficult for them to make an informed decision. In addition, if enough providers choose not to sign the subordination agreement, the Horizon/ASH program could face network adequacy problems due to lack of provider choice and difficulty accessing medically necessary care.

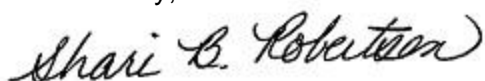
Establishing a Maximum Daily Rate for Reimbursement of Procedures

The materials distributed by Horizon/ASH state that participating SLPs will be limited to a daily rate of \$70 per patient regardless of the procedures performed and the medically necessary needs of the patient. ASHA is concerned with establishing a daily rate maximum on therapy services, but specifically its impact on complex patients with severe functional impairments, or multiple functional impairments, such as a speech-disorder and a swallowing disorder that must be addressed by an SLP.

ASHA requests a meeting to discuss concerns about Horizon/ASH's Chiropractic and Physical Medicine Services program and its impact on speech-language pathology services. While ASHA supports appropriate utilization management to promote the delivery of value-based care, we contend that the Horizon/ASH program will increase administrative burdens on providers while adversely impacting patient access to medically necessary care.

ASHA looks forward to meeting with you at your earliest convenience. To schedule a meeting or if you have any questions, please contact Michelle Cobb-King, ASHA's director of private health plans, reimbursement, at mcobb-king@asha.org or 301-296-5674.

Sincerely,



Shari B. Robertson, PhD, CCC-SLP
2019 ASHA President