



OCCUPATIONAL THERAPY ASSOCIATION OF OREGON

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May 7, 2015

Mr. Kevin Jeffries
Consumer Liaison
Oregon Insurance Division
P.O. Box 14480
Salem, Oregon 97309-0405

Dear Mr. Jeffries:

The Occupational Therapy Association of Oregon (OTAO) is the professional association representing the interests of occupational therapists, occupational therapy assistants, and students of occupational therapy. The practice of occupational therapy is science-driven, evidence-based, and enables people of all ages to live life to its fullest by promoting health and minimizing the functional effects of illness, injury, and disability. Our members want to ensure that consumers have adequate information about coverage of occupational therapy and other rehabilitative and habilitative services in their health insurance plans. **I understand that you are serving on a National Association of Insurance Commissioners Subgroup tasked with reviewing the Summary of Benefits and Coverage (SBC) document provided to health insurance applicants, enrollees, and policyholders. I ask that you consider my recommendations for improving the SBC document as you develop your own.**

In 2014 the American Occupational Therapy Association (AOTA) analyzed health plans offered in state- and federally-based marketplaces to determine whether occupational therapy and other rehabilitative and habilitative services were being covered according to the Affordable Care Act's requirements. In the course of their analysis AOTA identified several shortcomings in the SBC that made it difficult for consumers to understand the terms of coverage for rehabilitative and habilitative services.

Only about one-third of the SBCs AOTA surveyed made it clear if a consumer would need to meet the deductible before coverage for rehabilitative and habilitative services would take effect. Consumers who wrongly assume that the deductible doesn't apply to therapy services could encounter significant unexpected costs and many will probably forego therapy. Information on whether or not the deductible applies to specific services should be presented in the SBC, not just in other plan documents. I suggest adding the following language to the Important Questions section of the SBC: "Are there any services to which the deductible doesn't apply?"

AOTA's research identified significant variation in coverage of rehabilitation and habilitation among plans, and many of the plans surveyed had inadequate information on the kinds of therapies covered, with half of the plans not listing any of the services they covered under their rehabilitation and habilitation benefits in the SBC. Further, they found that some states allowed very low annual limits on the number of covered outpatient physical therapy, occupational therapy and speech-language

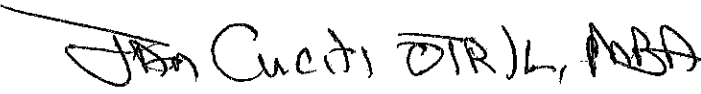
pathology visits, limits that could be a serious concern for consumers with conditions requiring intensive therapy. The SBC should clearly signal what services and how much of those services the plan offers.

The report is available online at: www.aota.org/ehb-report

AOTA's recommendations regarding the SBC template:

- Under "Rehabilitation services and devices" and "Habilitation services and devices," the core therapies listed in the Uniform Glossary of Coverage and Medical Terms' definition of rehabilitation and habilitation – physical therapy, occupational therapy, speech-language pathology and psychiatric rehabilitation (in the definition of rehabilitation) – should always be listed in the SBC if they are in fact covered.
- If there is a quantitative limit (e.g. number of days, hours, visits covered) applicable to that service, the SBC should clearly specify that limit in the "Limitations & Exceptions" column. Rehabilitation services and devices and habilitation services and devices that are not covered should be explicitly enumerated in the "Services Your Plan Does NOT Cover" section.
- The SBC should specify if the deductible applies to rehabilitation services and devices and habilitation services and devices.

Sincerely,



Jan Cuciti, OTR/L, MBA
President
Occupational Therapy Association of Oregon