



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

August 10, 2010

Nina Ruparel
Professional Management Office
Blue Cross Blue Shield of Illinois
300 East Randolph
Chicago, IL 60601

RE: Inclusion of Developmental Therapists as Participating Providers

Dear Ms. Ruparel:

I am writing this letter on behalf of 140,000 members of the American Speech-Language-Hearing Association (ASHA) in response to a June 2010 memo regarding the inclusion of applied behavioral analysts (ABA) and developmental therapists (DTs) in the Blue Cross Blue Shield of Illinois (BCBSIL) participating provider option network. ASHA is the professional, scientific, and credentialing body of audiologists, speech-language pathologists, and speech and hearing scientists, of which over 2,500 reside and practice in Illinois.

ASHA is opposed to the inclusion of DTs as preferred providers and believe that BCBSIL should reconsider its decision for following reasons.

Developmental Therapy Education and Training

According to the Illinois Developmental Therapy Association, developmental therapists obtain a minimum of a Bachelor's degree in early childhood or early childhood special education. They are credentialed as teachers in early childhood and thus are teachers, not therapists. The Illinois Department of Human Services further defines the duties of the DT as "family training, education, and support to assist the family of a child eligible for services in understanding the special needs of the child as related to developmental therapy services and enhancing the child's development." DTs in Illinois work exclusively in early intervention, while DTs in other states are typically engaged in the coordination of care, providing family support and education.

Speech-Language Pathology Education and Training

Speech-language pathologists (SLPs) receive at minimum a master's degree in communication sciences and disorders from an accredited program which in addition to approved coursework, includes over 400 hours of clinical training with individual clients of all ages, in a variety of education and health settings. Following completion of a master's degree, the SLP must pass a nationally standardized examination and complete a 9 month clinical fellowship supervised by an ASHA certified SLP.

Licensure

Licensure is a universally accepted mechanism to allow states to regulate professions, sanction unscrupulous providers, and – in general – protect consumers from harm. Forty-eight of fifty states, including Illinois and the District of Columbia, require SLPs to obtain a license to practice. Further, SLPs must work within a defined scope of practice and adhere to both national and state code of ethics. In Illinois, developmental therapists (DTs) are neither licensed professionals nor do they have a defined scope of practice or recognized code of ethical conduct. Thus unregulated, it is difficult to ascertain whether services from DTs may be inappropriate or beyond their area of expertise. Moreover, unethical or unqualified DTs cannot be removed or disciplined by the state. ASHA members in Illinois also report that some DTs provide “speech and language assessment and intervention services” clearly outside of their scope of qualifications. Because of the necessity of professionals to work together in the provision of services for families of very young children, there is a greater need for professionals to understand their roles and work closely to provide needed services for children.

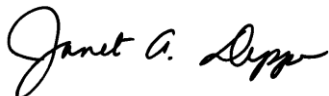
Developmental Therapy vs. Applied Behavioral Analysts

It is important to note that DTs and ABAs are not interchangeable. ABAs provide specific intervention services for children with autism. DTs may or may not be trained to deliver ABA services.

In conclusion developmental therapists provide key services for young children and their families enrolled in early intervention programs in Illinois. These include family education, training, and support. They are not licensed professionals and do not have an accepted scope of practice. It is imperative that they work closely with other early intervention professionals within their identified responsibility area to ensure that young children and their families receive needed early intervention services. As educators, they should not provide therapy services and may or may not be qualified to provide ABA.

ASHA urges BCBSIL to reconsider its proposed policy to include DTs as participating providers for the reasons noted above. Thank you for the opportunity to provide comments. Should you have any questions, please feel free to contact me at jdeppe@asha.org.

Sincerely,



Janet Deppe, MS, CCC-SLP
Director, State Advocacy

cc: Nancy Anderson
Kimberly Peppler
Susan Raad