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NYSAN-Advancing the Practice of Neuropsychology in New York

September 5, 2012

Donna Frescatore
Executive Director
New York Health Benefit Exchange

Dear Ms. Frescatore,

We want to thank you again for the opportunity to comment on the information disseminated at the 8/2/2012 NY Health Benefit Exchange meeting in Albany and for appointing one of our members to participate on a regional advisory committees dedicated to the development of the New York Health Benefit Exchange.

The New York State Association of Neuropsychology (NYSAN) members appreciate that the development of the Exchange is still in the early process and that the basic, over-arching model that will be used is still being selected. Nevertheless, while it may be too soon to comment on the coverage of specialty services within any of the listed benchmark plans, we feel it is not too early to be mindful of how specialty services will most appropriately be layered into the larger model once it is selected. NYSAN acknowledges that primary care providers will take on a greater role in the new patient centered model. However, with the vast literature demonstrating the need for an increasing number of subspecialties in the optimal diagnosis and treatment of various diseases and disorders, we would like to underscore that insurance plans must include provisions for services provided by specialists.

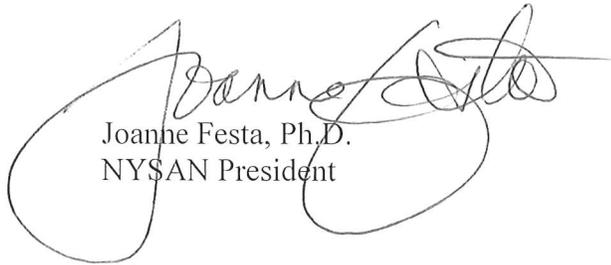
We look forward to the discussions within the regional advisory committees about how this can be done in the most cost efficient and appropriate manner. While neuropsychologists have particular expertise in this regard with respect to neurology and psychiatry, we believe that we also have helpful and unique input to discussions relating to optimal, cost effective management of patients with a wide range of syndromes and conditions (e.g., endocrinological, transplant, cardiac, pulmonary, sleep and pain disorders).

NYSAN also supports the inclusion of habilitative services and evaluation of them as a long-term approach to healthcare savings. Given the assumption that habilitative services will lead to greater functional outcomes, habilitation will likely reduce healthcare utilization in the long run. It is this kind of forward thinking that can facilitate a long-term, cost-effective Insurance Exchange, and we applaud your efforts in including habilitative services.

In addition, streamlining the administrative aspects of healthcare will lead to significant cost savings and reduce the frustrations for patients and providers. An essential goal of the Health Benefit Exchange should be to simplify the insurance process for patients and providers. Patients should be able to obtain rapid and clear information about their coverage and benefits. Forms should be simplified and streamlined. In the absence of these modifications, the Insurance Exchange will be inundated with calls and

inquires that will only increase the administrative costs of the system. NYSAN supports all efforts to minimize administrative burden on the insurance exchange, the providers, and most importantly, the patients.

As scientist-practitioners, we are in a unique position to assist with research and data collection that will be instrumental to the successful development of these exchanges. With knowledge from existing and newly-collected data, insurance exchange benefits can be developed in an informed manner, with a focus on both comprehensiveness as well as cost-savings. We look forward to assisting you in this process.

A handwritten signature in black ink, appearing to read "Joanne Festa", written over a large, stylized, circular scribble.

Joanne Festa, Ph.D.
NYSAN President

CC: NYSAN Board
Richard Leckerling